

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KNOLL, INC.,

Plaintiff,
-against-

No. 11 cv. 0488 (AKH)
ECF Case

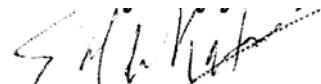
MODERNO, INC. d/b/a REGENCY SHOP,
AND MIKE SAXENA

Defendants.

DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF MOTION UNDER
FEDERAL RULE OF CIVIL PROCEDURE 12(c)
FOR JUDGMENT ON THE PLEADINGS

Dated: New York, NY
December 21, 2011

Respectfully submitted,



Salem M. Katsh
Katsh & Associates LLC
64 Main Street
Hastings on Hudson, NY 10706
914 231 7840(T)
646 4175777 (F)
skatsh@katshlaw.com

Robert Tilewick, Esq.
36 Putnam Green, Suite U
Greenwich, CT 06830
203 645 6829 (T)
203 286 2135 (F)
rtilewick@msn.com

TABLE OF CONTENTS

| | |
|---|-----|
| DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF MOTION UNDER FEDERAL RULE OF CIVIL PROCEDURE 12(c) FOR JUDGMENT ON THE PLEADINGS..... | i |
| TABLE OF CONTENTS..... | ii |
| TABLE OF AUTHORITIES..... | iii |
| FACTS AND SUMMARY OF ARGUMENT..... | 1 |
| ARGUMENT | 4 |
| I. KNOLL'S PLEADING FAILS TO ALLEGE NON-FUNCTIONALITY IN EITHER GENERAL OR SPECIFIC TERMS AND IS DEFICIENT AS A MATTER OF LAW..... | 4 |
| II. THE LANHAM ACT DOES NOT EMPOWER THE COURTS TO EXCLUDE COMPETITION WITH RESPECT TO UNPATENTED SHAPES OF UTILITARIAN COMMERCIAL PRODUCTS, IN THIS CASE CERTAIN ITEMS OF FURNITURE..... | 6 |
| A. <u>The Applicable Law</u> | 6 |
| B. <u>Knoll's Product Designs Cannot Be Protected By Trademark</u> | 11 |
| III. DEFENDANTS' DISCLAIMERS PRECLUDE A FINDING OF LIKELIHOOD OF CONFUSION AS A MATTER OF LAW..... | 13 |
| IV. KNOLL'S DERIVATIVE STATE LAW CLAIMS SHOULD BE DISMISSED | 15 |
| CONCLUSION | 16 |

TABLE OF AUTHORITIES

Cases

| | |
|---|--------------|
| <i>Ashcroft v. Iqbal</i> , 556 U.S. 662 (2009) | 14 |
| <i>Automated Salvage Transp. v. Wheelabrator Envtl. Sys.</i> , 155 F.3d 59 (2d Cir. 1998) | 5 |
| <i>Bonito Boats v. Thunder Craft Boats</i> , 489 U.S. 141 (1989) | 6, 7, 11, 16 |
| <i>Charles of Ritz Group, Ltd. v. Quality King Distrib., Inc.</i> , 832 F.2d 1317 (2d Cir. 1987) | 13 |
| <i>Compco Corp. v. Day-Brite Lighting, Inc.</i> , 376 U.S. 234 (1964) | 7, 11, 16 |
| <i>Consumers Union of United States, Inc. v. General Signal Corp.</i> , 724 F.2d 1044 (2d Cir. 1983), cert. denied , 469 U.S. 823 (1984) | 13 |
| <i>Crescent Tool Co. v. Kilborn & Bishop Co.</i> , 247 F. 299 (2d Cir. 1917) | 7 |
| <i>Desiano v. Warner-Lambert Co.</i> , 467 F.3d 85 (2d Cir. 2006) | 4 |
| <i>Eppendorf-Netheler-Hinz Gmbh v. Ritter Gmbh</i> , 289 F.3d 351 (5 th Cir.), cert. denied, 537 U.S. 1071 (2002) | 9 |
| <i>Eyal R.D. Corp v. Jewelex N.Y. Ltd.</i> , 784 F. Supp. 2d 441 (S.D.N.Y. 2011) | 15 |
| <i>Flagg Mfg. Co. v. Holway</i> , 178 Mass. 83 N.E. 667 (1901) | 7 |
| <i>Fourth Toro Ltd. Partnership v. PV Bakery, Inc.</i> , 88 F. Supp. 2d 188 (S.D.N.Y. 2000) | 13 |
| <i>Franco & Sons, Inc. v. Franek</i> , 615 F.3d 855 (7 th Cir. 2010) | 9, 11 |
| <i>Genesee Brewing Co. v. Stroh Brewing Co.</i> , 124 F.3d 137 (2d Cir. 1997) | 15 |
| <i>Heller, Inc. v. Design Within Reach, Inc.</i> , 2009 U.S. Dist. LEXIS 71991 (S.D.N.Y.) | 5 |
| <i>Home Box Office, Inc. v. Showtime/The Movie Channel, Inc.</i> ., 832 F.2d 1311 (2d Cir. 1987) | 13 |
| <i>Inwood Laboratories, Inc. v. Ives Laboratories, Inc.</i> , 456 U. S. 844 (1982) | 9, 10, 11 |
| <i>Kellogg Co. v. National Biscuit Co.</i> , 305 U.S. 111 (1938) | 7, 10 |
| <i>Lan Lan Wang v. Pataki</i> , 396 F. Supp. 2d 446 (S.D.N.Y. 2005) | 5 |
| <i>Landscape Forms, Inc. v. Columbia Cascade Co.</i> , 113 F.3d 373 (2d Cir. 1997) | 5, 10 |
| <i>Leatherman Tool Group, Inc. v. Cooper Indus.</i> , 199 F.3d 1009, 1011 (9 th Cir. 1999) | 12 |
| <i>Magnoni v. Smith & Lacquerzia, LLP</i> , 701 F. Supp. 2d 497 (S.D.N.Y. 2010) | 5 |
| <i>Nat'l Lighting v. Bridge Metal Indus., LLC</i> , 601 F. Supp. 2d 556 (S.D.N.Y. 2009) | 5 |
| <i>Nora Beverages, Inc. Perrier Group of America</i> , 269 F.3d 114 (2d Cir. 2001) | 10 |
| <i>Patsy's Italian Rest., Inc. v. Banas</i> , 658 F.3d 254 (2d Cir. 2011) | 13 |
| <i>Profitness Physical Therapy Ctr. v. Pro-Fit Orthopedic & Sports Physical Therapy P.C.</i> , 314 F.3d 62 (2d Cir. 2002) | 13 |
| <i>Qualitex Co. v. Jacobson Products Co.</i> , 514 U. S. 159 (1995) | 7, 9, 10 |
| <i>Quartuccio v. Lesko</i> , 2011 U.S. Dist. LEXIS 137885 (E.D.N.Y. 2011) | 4 |
| <i>Sears, Roebuck & Co. v. Stiffel Co.</i> , 376 U.S. 225 (1964) | 7, 10 |
| <i>Sherwood 48 Assocs. v. Sony Corp. of America</i> , 76 Fed. Appx. 389 (2d Cir. 2003) | 5 |
| <i>Singer Mfg. Co. v. June Mfg. Co.</i> , 163 U.S. 169 (1896) | 6, 10 |
| <i>Soltex Polymer Corp. v Fortex Industries, Inc.</i> , 832 F.2d 1325 (2d Cir. 1987) | 13 |
| <i>Specialized Products Inc. v. Greenwich Industr. L.P.</i> , 616 F. 3d 722, 727 (7 th Cir. 2010) | 12 |
| <i>Stormy Clime, Ltd. v. Progroup, Inc.</i> , 809 F.2d 971 (2d Cir. 1987) | 10 |
| <i>Thomas & Betts Corporation v. Panduit Corp.</i> , 65 F.3d 654 (7th Cir. 1995) | 7 |
| <i>Traffix Devices v. Mktg. Displays</i> , 532 U.S. 23 (2001) | passim |
| <i>Two Pesos, Inc. v. Taco Cabana, Inc.</i> , 505 U. S. 763 (1992) | 7 |
| <i>United States Polo Ass'n v. PRL USA Holdings, Inc.</i> , 2011 U.S. Dist. LEXIS 51707 (S.D.N.Y. 2011) | 15 |
| <i>Wal-Mart Stores v. Samara Bros.</i> , 529 U.S. 205 (2000) | passim |

| | |
|--|----|
| <i>West Point Mfg. Co. v. Detroit Stamping Co.</i> , 222 F.2d 581 (6 th Cir.), cert. denied, 350 U.S. 840 (1955)..... | 10 |
| <i>Yurman Design, Inc. v. PAJ, Inc.</i> , 262 F.3d 101 (2d Cir. 2001)..... | 5 |

Statutes

| | |
|--|-------|
| Lanham Act, Section 32..... | 2 |
| Lanham Act, Section 43(a) | 2, 15 |
| New York General Business Law, Section 360-l | 2, 15 |

Rules

| | |
|-------------------------------|-------------|
| Fed. R. Civ. P. 12(b)(6)..... | 4, 5 |
| Fed. R. Civ. P. 12(c) | 1, 4, 5, 14 |
| Fed. R. Evid. 201 | 5 |

Constitutional Provisions

| | |
|-----------------------------|----------|
| Article I, § 8, cl. 8 | 6, 7, 10 |
|-----------------------------|----------|

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KNOLL, INC.,

Plaintiff,

No . 11 cv. 0488 (AKH)

-against-

MODERNO, INC. d/b/a REGENCY SHOP,
AND MIKE SAXENA

Defendants.

**DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF MOTION UNDER FEDERAL
RULE OF CIVIL PROCEDURE 12(c) FOR JUDGMENT ON THE PLEADINGS**

In accordance with this Court's Order of December 2, 2011, Defendants respectfully submit their motion for Judgment on the Pleadings (attached for convenience as Exhs. A and B) under Rule 12(c), F.R.C.P.

FACTS AND SUMMARY OF ARGUMENT

Plaintiff Knoll is a furniture company. The Complaint alleges that in 1965 Ludwig Mies van der Rohe assigned to Knoll all of his rights in respect of certain items of furniture he designed and produced in 1929. Knoll obtained trademark registrations on the shapes of these furniture items in 2004. (Am. Compl. Exhs. A, B, C, D.) The shapes are depicted on and are the sole subject matter covered by, the registrations. (*Id.*)



In this lawsuit, Knoll has asserted claims against Defendants based on their sale of reproductions of these four furniture items, as pictured above -- a chair (Am. Compl. ¶ 15), a table (*id.* ¶ 20), a stool (*id.* ¶ 16), and a couch (*id.* ¶ 17). The claims asserted by Knoll are for trademark infringement under Section 32 of the Lanham Act, false designation of origin under Section 43(a) of the Lanham Act, unfair competition under New York common law, and Dilution under Section 360-l of the New York General Business Law. The essence of Knoll's Complaint is that, "As a result of Defendants' improper sale of furniture in the form of the designs that are the subject of Knoll's trademark registrations, architects, the furniture trade and the purchasing public are likely to buy Defendants' products in the erroneous belief that they are authorized reproductions of Knoll's trademarked designs or that the furniture item are otherwise associated with Knoll." (Am. Compl. ¶ 50.)

Defendants sell their products on their website, www.regencyshop.com, under their own trademark, "IBIZA". Knolls sells the products on its website, www.knoll.com, under its trademark, "Barcelona".

Products conforming to shapes of these pieces of furniture have been sold for years by a great many websites, and today one can buy replicas from well over one hundred websites. *Cf.* Amend. Answer Exh. A. Knoll, claiming that it produces a "genuine" copy of the 1929 Mies

designs using his original specifications, charges many thousands of dollars for each of these items—for example, the “Barcelona Chair” (in stainless steel) sells for approximately \$7500.¹ By contrast, none of the dozens of websites offering non-authentic replicas of this furniture charge anywhere near the prices Knoll charges. *Cf.* Amend. Answer Exh. A. For example, Defendants sell their IBIZA Chair reproduction for \$345.² The number and diversity of the websites selling these popular shapes, whether using the name “Barcelona”, “Mies”, “Pavilion”,³ or their own trademark, is quickly and dramatically revealed by even a cursory Google search (using search terms such as “Mies furniture”, “Barcelona furniture”).

This case is a “product configuration” case. No claim is made by Knoll that the Defendants are infringing any source-signifying Knoll trademark or trade dress in the form of labeling or packaging.

Four grounds for dismissal are urged on this motion.

1. Under established Second Circuit law, Knoll’s Amended Complaint should be dismissed as it fails to allege that any of the furniture items are non-functional. This deficiency has repeatedly been held to warrant dismissal of a pleading alleging violations of the Lanham Act based on the copying of product configurations.

2. Knoll’s claims must in all events be dismissed under the Supreme Court’s decisions in *Wal-Mart* (2000) and *Traffix* (2001). These decisions establish that the configuration of a utilitarian product, such as an item of furniture, is functional, is in the public domain, and may not be trademarked and thereby monopolized for an indefinite time period. To use an example: The Wonder Bread Company may enjoin others from copying the trademark “Wonder Bread” or its distinctive packaging trade dress which shows red, yellow and blue balloons. What it may not claim, however, assuming the absence of patents, is the right to prevent anyone who so desires from copying the shape, texture and ingredients of the bread itself and selling it under some different trademark and with different packaging. Over one hundred years of Supreme Court decisions have emphasized this rule of law. *Wal-Mart* and *Traffix* are the latest decisions

¹ http://www.knoll.com/products/product.jsp?prod_id=71;
[http://www.knoll.com/products/pricelists/KnollStudio\(PLKS0711\).pdf#page=1&pagezoomde=bookmarks&view=fit](http://www.knoll.com/products/pricelists/KnollStudio(PLKS0711).pdf#page=1&pagezoomde=bookmarks&view=fit).

² http://www.regencyshop.com/p63/Ibiza-Chair---Pure-Leather,-Stainless-Steel/product_info.html.

³ Mies designed the chairs as part of the German Pavilion at the Barcelona Exhibition in 1929.

and they apply the Court's jurisprudence in this area specifically to the issue of whether product configurations can be trademarked.

3. A third alternative ground for dismissal is based on the fact that, on those web pages where their IBIZA products are offered for sale, Defendants have placed disclaimers of unprecedented prominence, clarity and comprehensiveness. No rational person visiting Defendants' website could possibly conclude that there is any relationship between Defendants and Knoll, or that Knoll is the source of Defendants' products. The possibility of confusion actionable under the Lanham Act is zero. Second Circuit law recognizes that in an appropriate case a disclaimer can operate to defeat a trademark infringement claim.

4. Finally, where no valid trademark exists, claims for unfair competition and dilution may not be maintained under New York law consistent with pre-emption and Supremacy Clause considerations.

We submit that there are no triable issues of fact on any of these issues and that judgment as a matter of law may and should be entered for Defendants on the pleadings.

ARGUMENT

I. KNOLL'S PLEADING FAILS TO ALLEGE NON-FUNCTIONALITY IN EITHER GENERAL OR SPECIFIC TERMS AND IS DEFICIENT AS A MATTER OF LAW

Rule 12(c) and Rule 12(b)(6) motions are governed by the same standards. *Desiano v. Warner-Lambert Co.*, 467 F.3d 85, 89 (2d Cir. 2006). These standards were well-articulated in the recent case of *Quartuccio v. Lesko*, 2011 U.S. Dist. LEXIS 137885, 4-5 (E.D.N.Y. Nov. 22, 2011) (Rule 12(c) challenge). In discussing the Supreme Court's recently heightened pleading requirements applicable to a motion addressed to the pleadings, Judge Seybert stated:

In deciding Rule 12(b)(6) motions to dismiss, the Court applies a "plausibility standard," which is guided by "[t]wo working principles," *Ashcroft v. Iqbal*, 556 U.S. 662, 129 S. Ct. 1937, 1949, 173 L. Ed. 2d 868 (2009); *Harris v. Mills*, 572 F.3d 66, 72 (2d Cir. 2009). First, although the Court must accept all allegations as true, this "tenet" is "inapplicable to legal conclusions;" thus, "[t]hreadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice." *Harris*, 572 F.3d at 72 (alteration in original) (quoting *Ashcroft*, 129 S. Ct. at 1949). Second, only complaints that state a "plausible claim for relief" can survive Rule 12(b)(6). *Id.* Determining

whether a complaint does so is “a context specific task that requires the reviewing court to draw on its judicial experience and common sense.”⁴

Knoll’s Amended Complaint alleges many facts concerning Mies van der Rohe (Am. Compl ¶¶ 11-20), Knoll’s promotional activities (*id.* ¶¶ 22-27), and its trademark registrations (*id.* ¶¶ 28-33 & Exhs. A-F). But in terms of allegations relevant to Defendants’ purported liability, there are none.

As discussed in more detail below, no product configuration can be enjoined under the Lanham Act if it is functional, even in cases where, as here, the plaintiff has obtained trademark registrations. Under established Second Circuit case law, a complaint alleging Lanham Act violations based on a defendant’s alleged infringement of a product configuration must specify in detail what aspects of the product configuration are claimed to be non-functional.

Thus, in *Landscape Forms, Inc. v. Columbia Cascade Co.*, 113 F.3d 373, 381 (2d Cir. 1997), the court held that a “focus on the overall look of a product does not permit a plaintiff to dispense with an articulation of the specific elements of the product configuration which it claims warrants protection.” The case law makes clear that merely referring to and relying upon the pictures and summary descriptions in the trademark registrations is insufficient. *See Heller, Inc. v. Design Within Reach, Inc.*, 2009 U.S. Dist. LEXIS 71991 (S.D.N.Y.) (dismissal on Rule 12(b)(6) motion: plaintiff’s reliance on trademark registrations did not supply required specificity); *Sherwood 48 Assocs. v. Sony Corp. of America*, 76 Fed. Appx. 389, 2003 WL 2222 9422, at *2 (2d Cir. 2003) (affirming Rule 12(c) judgment on the pleading for failure to plead specifics of alleged non-functional trade dress)⁵; *Yurman Design, Inc. v. PAJ, Inc.*, 262 F.3d 101, 115-16 (2d Cir. 2001); *Nat’l Lighting v. Bridge Metal Indus., LLC*, 601 F. Supp. 2d 556, 562 (S.D.N.Y. 2009) (dismissal on the pleadings: a “laundry list of the elements that constitute a . . .

⁴ In evaluating a Rule 12(c) motion, the court may consider facts alleged in the pleadings, documents appended to the pleadings or incorporated by reference, and those for which it may take judicial notice. *See, e.g., Automated Salvage Transp. v. Wheelabrator Env'tl. Sys.*, 155 F.3d 59, 67 (2d Cir. 1998); Fed. R. Evid. 201 (judicial notice); *Magnoni v. Smith & Lacquerzia, LLP*, 701 F. Supp. 2d 497, 501 (S.D.N.Y. 2010) (court may take judicial notice of articles and web sites published on the Internet); *Lan Lan Wang v. Pataki*, 396 F. Supp. 2d 446, 453 n.1 (S.D.N.Y. 2005) (judicial notice).

⁵ We note that *Sherwood* is a non-citable case under the Second Circuit’s rules, as it pre-dates 2007. However, the case was cited by Judge Koeltl in his 2009 Heller opinion which we cite in the text, and it would seem odd if parties to a litigation could not cite the same cases that the judges in the district deciding the case cite and rely upon as relevant. If Your Honor disagrees, we respectfully would ask that the *Sherwood* case not be considered.

design” is insufficient).

Knoll’s Amended Complaint is completely inadequate to support its asserted claims. Far from failing to allege non-functionality with specificity, not a single allegation of the Amended Complaint addresses or even mentions non-functionality.

II. *THE LANHAM ACT DOES NOT EMPOWER THE COURTS TO EXCLUDE COMPETITION WITH RESPECT TO UNPATENTED SHAPES OF UTILITARIAN COMMERCIAL PRODUCTS, IN THIS CASE CERTAIN ITEMS OF FURNITURE*

A. The Applicable Law

Turning to the merits of Defendants’ first substantive argument—that the furniture designs are functional and cannot be trademarked—this issue is specifically controlled by the Supreme Court’s decisions in *Wal-Mart Stores v. Samara Bros.*, 529 U.S. 205 (2000) and *Traffix Devices v. Mktg. Displays*, 532 U.S. 23 (2001). These decisions continue a long line of decisions dating back for more than 100 years. The lietmotif running through all these decisions is that, while the trademark law can be used to prevent confusion, it cannot be used to monopolize a product.

The Patent Clause--Article I, § 8, cl. 8, of the Constitution--gives Congress the power “[t]o promote the Progress of Science and useful Arts, by securing *for limited Times* to Authors and Inventors the exclusive Right to their respective Writings and Discoveries” (emphasis added). The Patent Clause reflects a balance between the need to encourage innovation and the avoidance of unwarranted or unduly long monopoly rights. *Bonito Boats v. Thunder Craft Boats*, 489 U.S. 141 (1989) (this opinion arguably provides the most exhaustive and analytical treatment by the Court of this area of law).

The Patent Clause does not authorize trademarks.⁶ The key point established and emphatically reiterated by the Supreme Court and some of our greatest jurists is that no type of trademark or unfair competition law, whether federal or State, may cross the bounds set by the Patent Clause. See *Singer Mfg. Co. v. June Mfg. Co.*, 163 U.S. 169, 185 (1896) (Singer sewing machines could not be protected by unfair competition claim after expiration of patents); *Flagg*

⁶ Indeed, the first trademark statutes passed by Congress were based on the Patent Clause and were held unconstitutional by the Supreme Court inasmuch as the Patent Clause provided no authority for trademark legislation. See *The Trade-Mark Cases*, 100 U.S. 82 (1879). Congress has passed all subsequent trademark legislation under the Commerce Clause.

Mfg. Co. v. Holway, 178 Mass. 83, 59 N.E. 667 (1901) (Holmes, J.)⁷; *Kellogg Co. v. National Biscuit Co.*, 305 U.S. 111 (1938) (Brandeis, J.); *Crescent Tool Co. v. Kilborn & Bishop Co.*, 247 F. 299, 300 (2d Cir. 1917) (L. Hand, J.)⁸; *Sears, Roebuck & Co. v. Stiffel Co.*, 376 U.S. 225 (1964) (Black, J.); *Compco Corp. v. Day-Brite Lighting, Inc.*, 376 U.S. 234 (1964);⁹ *Qualitex Co. v. Jacobson Products Co.*, 514 U.S. 159 (1995) (Breyer, J.) (unpatented functional products are in the public domain and may not be trademarked); *Bonito Boats*, 489 U.S. at 146 (O'Connor, J.) (the copying of unpatented products is part of the “very lifeblood of a competitive economy”); cf. *Thomas & Betts Corporation v. Panduit Corp.*, 65 F.3d 654, 657 (7th Cir. 1995) (“Copying is not only good, it is a federal right -- a necessary component to the patent system’s grant of limited monopolies.”).¹⁰

The *Wal-Mart* (Scalia, J.) and *Traffix* (Kennedy, J.) cases fall squarely within the Court’s jurisprudence as to the scope and purpose of the Patent Clause, and apply that jurisprudence to the scope of protection that may be granted to trademarks. The cases arose after the Court, in *Two Pesos, Inc. v. Taco Cabana, Inc.*, 505 U.S. 763, 768-69 (1992), held that a restaurant’s overall appearance, its “trade dress”, could be considered inherently distinctive and, therefore, could be afforded Lanham Act protection without proof of secondary meaning. In *Wal-Mart*,

⁷ “Both zithers are adapted for the use of patented sheets of music, but the zithers are not patented. Under such circumstances the defendant has the same right that the plaintiff has to manufacture instruments in the present form, to imitate the arrangement of the plaintiff’s strings or the shape of the body. In the absence of a patent the freedom of manufacture cannot be cut down under the name of preventing unfair competition.... [T]he plaintiff’s right can be protected sufficiently by requiring the defendant’s zithers to be clearly marked so as to indicate unmistakably that they are the defendant’s and not the plaintiff’s goods.”

⁸ “[The] plaintiff has the right not to lose his customers through false representations that those are his wares which in fact are not, but he may not monopolize any design or pattern, however trifling. The defendant, on the other hand, may copy the plaintiff’s goods slavishly down to the minutest detail; but he may not represent himself as the plaintiff in their sale”.

⁹ The Court invalidated, as inconsistent with the Patent Clause, state unfair competition laws that outlawed the copying of novel product configurations.

¹⁰ See also *Qualitex*, 514 U.S. at 164-65: “It is the province of patent law, not trademark law, to encourage invention by granting inventors a monopoly over new product designs or functions for a limited time, 35 U.S.C. §§ 154, 173, after which competitors are free to use the innovation. If a product’s functional features could be used as trademarks, however, a monopoly over such features could be obtained without regard to whether they qualify as patents and could be extended forever (because trademarks may be renewed in perpetuity).”

Samara claimed that its clothing designs qualified as inherently distinctive trade dress under *Two Pesos* and could be enforced without proof of secondary meaning. However, the *Wal-Mart* Court distinguished *Two Pesos* as involving non-functional trade dress in the form of packaging, not the functional, actual product itself. 529 U.S. at 215 (“*Two Pesos* is inapposite to our holding here because the trade dress at issue, the décor of a restaurant, seems to us not to constitute product design.”)

The Court pointed out that (1) trademark law was not designed, as was the Patent law, to confer monopoly rights on functional products but rather to protect words, symbols and other non-functional indicia of source from being unfairly misappropriated to mislead consumers (*id.* at 214); and (2) a product’s shape will “almost invariably” be functional and not constitute a source identifier. *Per Justice Scalia:*

The attribution of inherent distinctiveness to certain categories of word marks and product packaging derives from the fact that the very purpose of attaching a particular word to a product, or encasing it in a distinctive packaging, is most often to identify the source of the product.... Consumers are therefore predisposed to regard those symbols as indication of the producer, which is why such symbols “almost automatically tell a customer that they refer to a brand,” and “immediately ... signal a brand.”

529 U.S. at 212-213 (emphasis in original, citation omitted).

In establishing a new rule that the designation of “inherent distinctiveness” could *never* be applied to product designs, the Court explained that it was motivated not simply because product shapes would rarely if ever warrant such a designation. Justice Scalia stated that the Court also wanted to empower the lower courts summarily to dispose of “strike suits” where the Alleged trademark consisted of nothing more than the product itself.

The fact that product design almost invariably serves purposes other than source identification not only renders inherent distinctiveness problematic; it also renders application of an inherent-distinctiveness principle more harmful to other consumer interests. Consumers should not be deprived of the benefits of competition with regard to the utilitarian and esthetic purposes that product design ordinarily serves by a rule of law that facilitates plausible threats of suit against new entrants based upon alleged inherent distinctiveness.

Id. at 213.

Traffix, decided one year later in 2001, provided concrete criteria for determining functionality (1) where the product configuration is utilitarian, and (2) where the product is non-

utilitarian and the reason consumers buy the product is because of its “aesthetic” appeal rather than because it comes from a specific source.

As this lawsuit involves utilitarian items of furniture, it is governed by the functionality test the *Traffix* Court adopted/affirmed for utilitarian products. With respect to such products, the Court referenced its 1982 decision in *Inwood Laboratories, Inc. v. Ives Laboratories, Inc.*, 456 U.S. 844 (1982). The Court stated that “Whether a utility patent has expired or there has been no utility patent at all, a product design should be viewed as functional when it is ‘essential to the use or purpose of the article’ or ‘affects the cost or quality of the article.’ *Traffix*, 532 U.S. at 35 (emphasis added), quoting *Inwood Labs.*, 456 U.S. at 850 n.10.

This definition will, as Justice Scalia stated in *Wal-Mart*, “almost invariably” result in findings of functionality with respect to utilitarian products. 529 U.S. at 213. A good example of how this definition works in practice was given by Judge Easterbrook in *Jay Franco & Sons, Inc. v. Franek*, 615 F.3d 855, 857 (7th Cir. 2010), involving a trademarked circular beach towel.

Traffix says that a design is functional when it is “essential to the use or purpose of the device or when it affects the cost or quality of the device,” 532 U.S. at 33, a definition cribbed from *Inwood Laboratories*, ... 456 U.S. at 850 n.10. So if a design enables a product to operate, or improves on a substitute design in some way (such as by making the product cheaper, faster, lighter, or stronger), then the design cannot be trademarked; it is functional because consumers would pay to have it rather than be indifferent toward or pay to avoid it.

The *Traffix* Court noted that *non-functionality*, in terms of a utilitarian product configuration, would only pertain to some feature that is “merely an ornamental, incidental, or arbitrary aspect of the device”). *See also Eppendorf-Netheler-Hinz GmbH v. Ritter GmbH*, 289 F.3d 351, 355 (5th Cir.), cert. denied, 537 U.S. 1071 (2002). (“trade dress protection extends only to incidental, arbitrary or ornamental product features which identify the source of the product. If a product feature is functional, it cannot be protected trade dress. Unless protected by patent or copyright, functional product features may be copied freely by competitors in the marketplace”).

The *Traffix* Court also resolved a conflict among the circuits: some lower courts had assumed that, to find a utilitarian product shape functional, there must be proof that viable competitive alternatives do not exist—the so-called “competitive necessity” test. The Court held that competitive considerations were relevant only in cases, such as *Qualitex Co. v. Jacobson Products Co.*, 514 U.S. 159 (1995), where the defendant sought to prove a defense of “aesthetic

functionality”. The Court made it clear that a competitive necessity test was wholly inapposite where the issue was functionality of a utilitarian product configuration under the *Inwood* test:

It is proper to inquire into a “significant non-reputation-related disadvantage” [i.e., the competitive necessity test] in cases of aesthetic functionality, the question involved in *Qualitex*. ***Where the design is functional under the Inwood formulation there is no need to proceed further to consider if there is a competitive necessity for the feature.***

532 U.S. at 33 (emphasis added.)¹¹

The *Traffix* Court re-emphasized further concepts dating back to *Singer* and *Kellogg*, namely, that no amount of fame can secure trademark protection for a product, and that investments directed toward fostering an “association” between a producer and a product will not trump the policies and provisions of the Patent Clause:

The Lanham Act, furthermore, does not protect trade dress in a functional design simply because an investment has been made to encourage the public to associate a particular functional feature with a single manufacturer or seller. The Court of Appeals erred in viewing MDI as possessing the right to exclude competitors from using a design identical to MDI’s and to require those competitors to adopt a different design simply to avoid copying it. MDI cannot gain the exclusive right to produce sign stands using the dual-spring design by asserting that consumers associate it with the look of the invention itself.

532 U.S. at 34-35. *See also, e.g.*, *Stiffel*, 376 U.S. at 231 (“That Stiffel originated the pole lamp and made it popular is immaterial”).¹²

¹¹ In terms of Second Circuit cases, prior to *Wal-Mart* and *Traffix*, the Second Circuit had stated: “[T]his circuit appears to be moving toward a rule that packaging is usually indicative of a product’s source, while the design or configuration of the product is usually not so.” *Landscape Forms, Inc. v. Columbia Cascade Co.*, 113 F.3d 373, 379 (2d Cir. 1997). Other Second Circuit cases assumed, as did some circuit courts, that the test of functionality was “competitive necessity” even as to utilitarian products. *See Stormy Clime, Ltd. v. Progroup, Inc.*, 809 F.2d 971 (2d Cir. 1987). As noted in the text, *Traffix* resolved a split in the circuits and explicitly rejected a “competitive necessity” rule as to utilitarian products that met the functionality definition of *Inwood*. Post-*Traffix*, the Second Circuit has not had occasion to decide any case that has involved the *Inwood* functionality test. *Nora Beverages, Inc. Perrier Group of America*, 269 F.3d 114 (2d Cir. 2001) (court affirmed dismissal by lower court, which had applied pre-*Wal-Mart* law; court noted, however, that the case could have been dismissed based on *Traffix* and related cases).

¹² To be relevant in a trademark context, an “association” must be akin to a word mark in directing a purchase decision. Someone looking at an unlabeled roll of film may “associate” it with Kodak; someone looking at a beautiful non-labeled piano may “associate” it with Steinway; someone looking at an unlabeled replica of a Stickley chair may “associate” the piece of furniture with that famous designer – but that is not a *purchase-related* association and has no trademark significance. Cf. *Kellogg*, 305 U.S. at 118. It was perhaps best said by the Sixth Circuit in *West Point Mfg. Co. v. Detroit Stamping Co.*, 222 F.2d 581, 595 (6th Cir.), cert. denied, 350 U.S. 840 (1955) (applying *Kellogg* test), namely, that an

Finally, the *Trafficx* Court made clear that while proof of secondary meaning could support trademark protection for aesthetic designs, once a utilitarian product shape has been found to be functional, there is no occasion to consider a claim of alleged secondary meaning as to that shape. *Trafficx* at 33 (“Functionality having been established, whether MDI’s dual-spring design has acquired secondary meaning need not be considered”).

B. Knoll’s Product Designs Cannot Be Protected By Trademark

In view of the applicable case law, we submit that there is no legally cognizable theory of liability upon which this lawsuit could be grounded. Notwithstanding Knoll’s “incontestable” registrations, not one of Knoll’s four claims can stand as a matter of law. In a situation where, as here, the product configurations are utilitarian and functional, there can be no trademark rights, and any registrations lose all legal force.¹³ Nor may relief be obtained under state unfair competition law. *Sears, Compco, Bonito Boats*.

The four “Barcelona” items easily satisfy the Supreme Court’s test for functionality. They are utilitarian by any definition. The product configurations are “essential to the use and purpose of the product.” *Trafficx*, 532 U.S. at 35; *Inwood*, 456 U.S. at 850 n.10. They “enable[] [the] product[s] to operate” (*Jay Franco & Sons*, 615 F. 3d at 857); they are “functional because consumers would pay to have [the designs] rather than be indifferent toward or pay to avoid [them]...” (*id.*).

As in the case of all chairs, tables, stools and couches, in designing the four pieces of furniture at issue, Mies had to include legs, seats, backs, straps, table tops, etc. These are the features which had to be included because they are “essential to the use and purpose of the product.” *Trafficx*, 532 U.S. at 35; *Inwood*, 456 U.S. at 850 n.10. And these are the only product features depicted and claimed on Knoll’s trademark registrations. (Amend. Compl. Exhs A-D.) Indeed, as Knoll’s Amended Complaint and its registrations make clear, the product “features” in this case are nothing other than the products themselves.

“association” of trademark significance is one that leads a consumer to say to himself: “That is the article I want because I know its source”. The fame and generalized “association” Knoll alleges are meaningless from a trademark standpoint because they say nothing as to the desire of consumers to want Knoll as the source of their purchases.

¹³ The Lanham Act itself makes this point very clear in specifying that any “incontestable” mark may in fact be contested on grounds of functionality. 15 U.S.C. § 1115(b)(8). Knoll’s registrations simply beg the functionality issue. As for Knoll’s claim that Defendants have the burden of proof, that is true, but it is also abundantly true that Defendants’ have met that burden in this case.

The fact that Mies made design choices does not render the products non-utilitarian or non-functional. Mies' product designs are not "ornaments"; they are the actual products; without their component parts the products would be useless. The elements Mies chose are functional "not because [they are] the only way to do things, but because [they] represent[] one of many solutions to a problem" that had to be resolved. *Specialized Products Inc. v. Greenwich Industr. L.P.*, 616 F. 3d 722, 727 (7th Cir. 2010).¹⁴

The reason Justice Scalia could state with such certainty that product configurations will "almost invariably" be functional, is because virtually any utilitarian product one can think of will obviously have to be made of elements that are essential for the product to operate as intended.

In sum, if "trademarks" such as Knoll seeks to enforce were allowed, the result would be that purely utilitarian, functional shapes could effectively enjoy patent-type protection for an unlimited term, violating a rule the Supreme Court has, as we have seen, protected and fostered for over 100 years. Aside from the vast number of furniture items having highly distinctive appearances, there are literally thousands, probably hundreds of thousands if not millions, of interesting, distinctive-looking products on the market, from tools, to rugs, to bottles, to hats, eyeglass frames, computer devices, personal items such as wallets and belts--and on and on. As the Ninth Circuit put it in 1999, correctly anticipating how the Supreme Court would analyze the functionality issue, "[t]o uphold a finding of infringement here... would suggest that the general appearance of almost *any* unpatented product rarely if ever could be copied faithfully."

Leatherman Tool Group, Inc. v. Cooper Indus., 199 F.3d 1009, 1011 (9th Cir. 1999) (emphasis in original).

¹⁴ Mies van der Rohe was a giant in the field of architecture and the Modernistic movement. It is preposterous to think that he designed the furniture pieces in question so that they would serve as trademarks, rather than as functional reflections of his philosophy. As is well known, the Barcelona chair was designed to provide elegant seating for the visit of the King and Queen of Spain to the 1929 Exhibition in Barcelona . As Mies said of the chair: "The chair is a very difficult object. Everyone who has ever tried to make one knows that. There are endless possibilities and many problems - the chair has to be light, it has to be strong, it has to be comfortable. It is almost easier to build a sky scraper than a chair." <http://www.thedesignfile.net/thedesignfile/2011/09/iconic-barcelona-chair-is-always-stylish.html>. This approach is the antithesis of one that emphasizes non-functional items-- ornAments or arbitrary designs unrelated to the product's utilitarian use and purpose-- which can serve as a trademark/trade dress.

III. DEFENDANTS' DISCLAIMERS PRECLUDE A FINDING OF LIKELIHOOD OF CONFUSION AS A MATTER OF LAW

It is settled law in the Second Circuit that a disclaimer can serve as a complete answer to a charge of trademark infringement, although the defendant bears the burden to show that the disclaimer will be effective. The court commented very favorably on the use of disclaimers in *Consumers Union of United States, Inc. v. General Signal Corp.*, 724 F.2d 1044, 1053 (2d Cir. 1983), *cert. denied*, 469 U.S. 823 (1984) (injunction not available “where there is any possibility that an explanation or disclaimer will suffice”). *See also Soltex Polymer Corp. v Fortex Industries, Inc.*, 832 F.2d 1325, 1329-30 (2d Cir. 1987) (district court has wide discretion in fashioning relief, including use of disclaimers).

In subsequent cases, the Second Circuit expressed reservations as to the effectiveness of disclaimers. *See Home Box Office, Inc. v. Showtime/The Movie Channel, Inc.*, 832 F.2d 1311, 1315 (2d Cir. 1987), and *Charles of Ritz Group, Ltd. v. Quality King Distrib., Inc.*, 832 F.2d 1317, 1324 (2d Cir. 1987); *Profitness Physical Therapy Ctr. v. Pro-Fit Orthopedic & Sports Physical Therapy P.C.*, 314 F.3d 62, 70-71 (2d Cir. 2002) (mere use of negator words such as ‘no’ or ‘not’ generally ineffective).

Most recently, the court has assumed a balanced position and has reaffirmed that disclaimers in proper cases can be useful in resolving trademark disputes. *Patsy's Italian Rest., Inc. v. Banas*, 658 F.3d 254, 273-74 (2d Cir. 2011): “Given the district court’s great flexibility in fashioning relief ... we have frequently recognized that the use of a disclaimer sign can, in the right circumstances, be appropriate relief.” *See also Fourth Toro Ltd. Partnership v. PV Bakery, Inc.*, 88 F. Supp. 2d 188, 198-99 (S.D.N.Y. 2000) (AKH) (to prevent confusion, the court ordered disclaimers of non-affiliation).

Defendants submit that, if there was ever a case where a disclaimer should be held effective as a matter of law, this is the case.

Defendants’ disclaimer (Amend. Answer Exh. B) is positioned in a prominent location on Defendants’ website and, in Capital Letters, explains in great detail that there is absolutely no relationship of any kind between Knoll and Defendants and that Knoll is not the source of Defendants’ products. For example, on the page advertising the IBIZA Chair, Defendants’ inexpensive “knock off” of the Barcelona Chair, the website provides as follows

(http://www.regencyshop.com/p63/Ibiza-Chair---Pure-Leather,-Stainless-Steel/product_info.html?osCsid=b65f80dbf4916d4f18e182faa36900e7):

DISCLAIMER

OUR IBIZA CHAIR IS A REPLICA OF A CHAIR DESIGNED IN 1929 BY MIES VAN DER ROHE, OFTEN REFERRED TO AS THE BARCELONA CHAIR. KNOLL, INC. PRODUCES AND SELLS THE AUTHENTIC BARCELONA CHAIR, WITH THE ENGRAVED SIGNATURE OF MIES VAN DER ROHE AND A CERTIFICATE OF AUTHENTICITY, AT PRICES IN THE THOUSANDS OF DOLLARS, MANY TIMES HIGHER THAN THE PRICE OF OUR IBIZA CHAIR. OUR REPLICA OF THE BARCELONA CHAIR IS INTENDED FOR CONSUMERS WHO WISH TO PURCHASE A REPRODUCTION OF A CHAIR OF HISTORIC DESIGN AT AN AFFORDABLE PRICE. REGENCYSHOP HAS NO AFFILIATION WITH KNOLL AND DOES NOT SELL, DISTRIBUTE OR OFFER FOR SALE ANY PRODUCT MADE OR OFFERED FOR SALE BY KNOLL. WHILE THE IBIZA CHAIR HAS A SIMILAR DESIGN TO THE BARCELONA CHAIR SOLD BY KNOLL, REGENCYSHOP CANNOT GUARANTEE THAT THE IBIZA REPLICA CONFORMS TO THE EXACT SPECIFICATIONS OF THE CHAIR DESIGNED BY MIES VAN DER ROHE AND SOLD BY KNOLL. VISITORS TO THIS SITE WHO WISH TO CONSIDER BUYING THE BARCELONA CHAIR FROM KNOLL, SHOULD VISIT KNOLL'S WEBSITE AT KNOLL.COM.

The *sine qua non* of a trademark infringement case is, of course, proof that consumers may likely be confused. Knoll's Complaint thus alleges that: "As a result of Defendants' improper sale of furniture in the form of the designs that are the subject of Knoll's trademark registrations, architects, the furniture trade and the purchasing public are likely to buy Defendants' products in the erroneous belief that they are authorized reproductions of Knoll's trademarked designs or that the furniture items are otherwise associated with Knoll." (Am. Compl ¶ 50.) As already noted, this kind of allegation, essentially offering assertions of law, may be discarded by a court considering a Rule 12(c) motion. *Ashcroft v. Iqbal*, 556 U.S. 662 (2009).

But even if the allegation were given consideration, the simple fact is that it cannot stand in the face of Defendants' disclaimer, which is part of the pleadings (Am. Answer, Exh. B). No cognizable argument can be advanced that any rational

consumer could, in visiting Defendants' website, be misled as Knoll alleges. A judgment as a matter of law on this issue is therefore fully justified.¹⁵

IV. KNOLL'S DERIVATIVE STATE LAW CLAIMS SHOULD BE DISMISSED

Knoll's complaint contains bare-bones allegations of two state law claims, unfair competition (Count III), and dilution under N.Y. Gen. Bus. L. § 360-1 (formerly § 386-d) (Count IV). Unfair competition under New York Law is "almost indistinguishable" from a claim under 43(a) of the Lanham Act (addressed above), with the added burden that plaintiff must show that the alleged infringer acted in bad faith. *E.g., United States Polo Ass'n v. PRL USA Holdings, Inc.*, 2011 U.S. Dist. LEXIS 51707, ** 54-55 (S.D.N.Y. 2011); *accord Genesee Brewing Co. v. Stroh Brewing Co.*, 124 F.3d 137, 149 (2d Cir. 1997). Given that Knoll's pleading fails to state a 43(a) claim, as a matter of law it cannot state a claim for unfair competition under New York law.

As far as Knoll's state law dilution claim is concerned, such a claim requires "(1) that the trademark is truly distinctive or has acquired secondary meaning, and (2) a likelihood of dilution either as a result of 'blurring' or 'tarnishment.'" *E.g., Eyal R.D. Corp v. Jewelex N.Y. Ltd.*, 784 F. Supp. 2d 441, 449 (S.D.N.Y. 2011) (AKH). Since Knoll's trademarks are invalid because

¹⁵ Recognizing that there can be no confusion at the "point of sale"—that is, Defendants' website at the time a buyer makes a purchase—in Knoll's letter to the Court of November 28, 2011, it advances the argument that liability could be based on so-called post sale confusion. This theory is nowhere alleged by Knoll in its Complaint. And for good reason. The post-sale confusion cases deal with situations where people may see knockoffs, may believe that they are genuine, and may as a result buy these knockoffs believing them to be genuine. That scenario cannot happen here. Someone wanting a genuine Mies chair after seeing an IBIZA chair has only one place to go to buy a "genuine" reproduction—Knoll. If he goes to Defendants' site, he will immediately see the disclaimer. There is simply no way that Defendants' sale of Mies designs under their own trademark, caveated by an unprecedented disclaimer, could ever lead to actionable confusion. Knoll's post-sale argument is, as already noted, nowhere alleged in the Complaint or Amended Complaint. Knoll has sophisticated trademark counsel and the foolishness of a post-sale claim could not have been lost on them. Any request for leave to Amend to assert such a claim should be denied.

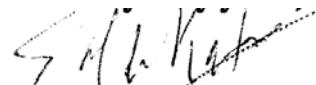
they purport to cover functional product shapes, Knoll cannot establish a dilution claim, which, as just noted, is dependent on the existence of a valid trademark. To provide greater protection than federal law, would violate the *Sears-Compco* and *Bonito Boats* line of cases. *See also Eyal*, 784 F. Supp. at 449 (dismissing dilution claim as preempted).

CONCLUSION

For the forgoing reasons, plaintiff's complaint should be dismissed with prejudice.

Dated: December 21, 2011

Respectfully submitted,



Salem M. Katsh
Katsh & Associates LLC
64 Main Street
Hastings on Hudson, NY 10706
914 231 7840 (T)
646 417 5777 (F)
skatsh@katshlaw.com

Robert Tilewick, Esq.
36 Putnam Green, Suite U
Greenwich, CT 06830
203 645 6829 (T)
203 286 2135 (F)
rtilewick@msn.com

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KNOLL, INC.,

Plaintiff,

v.

MODERNO, INC. and URBAN MOD
INC., D/B/A REGENCY SHOP, and MIKE
SAXENA,

Defendants.

Civil Action No. 11-CV-0488

**AMENDED COMPLAINT
FOR TRADEMARK INFRINGEMENT
AND RELATED CAUSES**

JURY TRIAL DEMANDED

Plaintiff, by its attorneys, for its Complaint against the Defendants, alleges:

JURISDICTION AND VENUE

1. This is an action for violation of Sections 32 and 43 (a) of the Lanham Act, 15 U.S.C. §§ 1114, 1125; for violation of Section 360-l of the New York General Business Law; and for violation of the common law of the State of New York pertaining to unfair competition.
2. This Court has jurisdiction over the subject matter of these claims pursuant to 28 U.S.C. § 1338 and under principles of supplemental jurisdiction, 28 U.S.C. §1337(a). Venue is proper in this judicial district pursuant to 28 U.S.C. § 1339.

THE PARTIES

3. Plaintiff Knoll, Inc. ("Knoll") is a corporation organized and existing under the laws of the State of Delaware, maintaining a place of business at 76 Ninth Avenue, New York, New York 10021.
4. Knoll is a leading designer and manufacturer of branded furniture.

5. Knoll believes that good design is good business. Indeed, since its founding in 1938, Knoll has been recognized as a design leader worldwide.

6. Knoll products are exhibited in major art museums worldwide, with more than 40 Knoll pieces in the permanent Design Collection of The Museum of Modern Art in New York, New York.

7.(a) Upon information and belief, Defendant Modemo, Inc., is a corporation organized and existing under the laws of California, maintaining a place of business at 1661 S. Diamond Bar Boulevard, Diamond Bar, California 901765, and has done and continues to do business as Regency Shop.

7. (b) Upon information and belief, Urban Mod, Inc., is a corporation organized and existing under the laws of Nevada, maintaining a place of business at 1625 W. 144th Street, Unit 2, Gardena, CA 90247, and has done and continues to do business as Regency Shop.

8. Upon information and belief, Defendant Mike Saxena, is an individual with an address at 1625 W. 144th Street, Unit 2, Gardena, CA 90247. Upon information and belief, Defendant Mike Saxena is a principal of Defendants Modemo, Inc. and Urban Mod, Inc., and is responsible for their infringing activities. (Collectively, Modemo, Inc., Urban Mod, Inc., and Mike Saxena are hereinafter referred to as "Defendants")

9. Defendants now conduct or have in the past conducted their business over the internet through their website at <http://www.regencyshop.com/>.

10. Defendants transact business within this district, derive revenue from intrastate and interstate commerce, and have committed tortious acts within this district

and also without this district having consequences within this district, and said Defendants are otherwise within the jurisdiction of this Court.

FACTS COMMON TO ALL COUNTS

LUDWIG MIES VAN DER ROHE

11. Ludwig Mies van der Rohe ("Mies van der Rohe") was a world-famous architect and one of the most influential architects of the twentieth century.

12. Mies van der Rohe was the director of the Bauhaus school of design from 1930 to 1933, and moved to the United States in 1937 to continue his architectural activities.

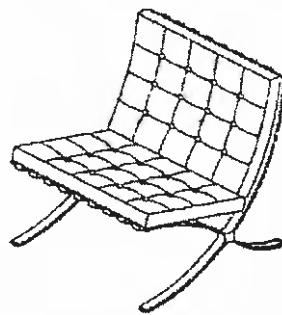
13. Among Mies van der Rohe's more well-known architectural works are the Seagram Building in New York City; the Lakeshore Drive Apartments in Chicago, Illinois; the German Pavilion for the 1929 Barcelona International Exhibition; and the Tugendhat House, in Brno, Czech Republic.

THE GERMAN PAVILION

14. In 1928, Mies van der Rohe was asked to design the German pavilion for the 1929 Barcelona International Exhibition. The result was one of Mies van der Rohe's most well-known architectural designs.

A. The Barcelona Chair

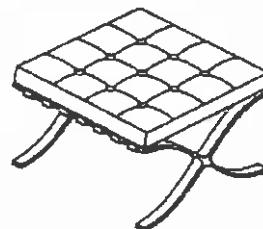
15. In addition to designing the German Pavilion, Mies van der Rohe also designed the furniture featured inside the pavilion. He designed a chair in the form of the design that is set forth below:



Architects, the furniture trade and the public have come to refer to this chair as the "Barcelona Chair".

B. The Barcelona Stool

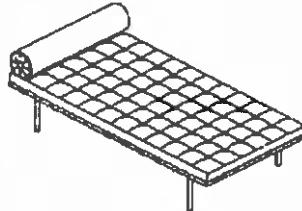
16. Along with the "Barcelona Chair", Mies van der Rohe also designed an ottoman for the German Pavilion in the form of the design that is set forth below:



Architects, the furniture trade and the public have come to refer to this ottoman as the "Barcelona Stool".

C. The Barcelona Couch

17. In 1930, Mies van der Rohe designed a couch or daybed that later gained fame when he featured it in the Farnsworth House, which he designed in 1948 for Dr. Edith Farnsworth. The couch was in the form of the design that is set forth below:



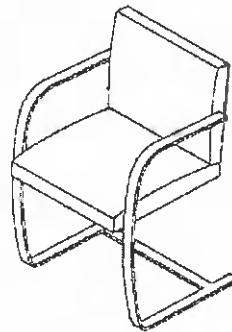
Architects, the furniture trade and the public have come to refer to this couch as the "Barcelona Couch".

THE TUGENDHAT HOUSE

18. In 1928, Mies van der Rohe was commissioned to design a home for Grete and Fritz Tugendhat. The resulting Tugendhat House in Brno, Czech Republic is one of Mies van der Rohe's most well-known architectural designs.

A. The Flat Brno Chair

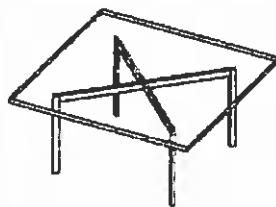
19. In addition to designing the Tugendhat House, Mies van der Rohe also designed much of the furniture used to furnish the Tugendhat House. He designed for the Tugendhat House a chair in the form of the design that is set forth below:



Architects, the furniture trade and the public have come to refer to this chair as the "Flat Brno Chair".

B. The Barcelona Table

20. Along with the "Flat Brno Chair", Mies van der Rohe also designed a table for the Tugendhat House in the form of the design that is set forth below:



Architects, the furniture trade and the public have come to refer to this table as the "Barcelona Table" or the "Tugendhat Table".

KNOLL AND ITS RIGHTS IN THE BARCELONA COLLECTION

21. By an agreement dating from November 1, 1965, Mies van der Rohe assigned all rights, title and interest in and to the design of the Barcelona Chair, the Barcelona Stool, the Barcelona Couch, the Barcelona Table and the Flat Brno Chair (hereinafter collectively referred to as the "Barcelona Collection") to predecessors of Knoll as to the rights herein involved.

22. Knoll and its predecessors in interest as to the rights herein involved have been continuously manufacturing, displaying, promoting and selling the Barcelona Collection since at least as early as January 1, 1954.

23. The various furniture items in the Barcelona Collection have been the subjects of third party commentary in numerous books, newspaper articles and magazine articles, virtually all of which identify Knoll or its predecessors in interest as to the rights herein involved as the source of these items.

24. The various furniture items in the Barcelona Collection are in the collections of numerous museums featuring design around the world, and have been featured in a number of museum exhibitions.

25. The Barcelona Collection is in the Museum of Modern Art's design collection. Some of these pieces have been there since the 1950s. The Museum of Modern Art, as well as other museums, always identify Mies van der Rohe as the designer of the Barcelona Collection, and Knoll as the source and manufacturer of these items.

26. Knoll markets and sells the Barcelona Collection throughout the United States and internationally. In connection with these efforts, Knoll maintains an internet website at <http://www.knoll.com>, which contains information about Knoll's furniture products. Knoll also issues advertising and promotional material relating to the Barcelona Collection, and has done so for many years.

27. As a result of all of the foregoing sales, manufacturing and promotional efforts, the Barcelona Chair, the Barcelona Stool, the Barcelona Couch, the Barcelona Table, the Flat Bmo Chair and the BARCELONA trademark have come to be associated with Knoll as their source.

KNOLL'S RELEVANT TRADEMARK REGISTRATIONS

28. On or about October 12, 2004, the Barcelona Chair was registered as a trademark with the United States Patent and Trademark Office. Knoll's registration for the Barcelona Chair, No. 2,893,025, remains in full force and effect and is incontestable. A copy of this registration is attached as Exhibit A.

29. On or about October 19, 2004, the Barcelona Stool was registered as a trademark with the United States Patent and Trademark Office. Knoll's registration for the Barcelona Stool, No. 2,894,977, remains in full force and effect and is incontestable. A copy of this registration is attached as Exhibit B.

30. On or about October 19, 2004, the Barcelona Couch was registered as a trademark with the United States Patent and Trademark Office. Knoll's registration for the Barcelona Couch, No. 2,894,980, remains in full force and effect and is incontestable. A copy of this registration is attached as Exhibit C.

31. On or about October 19, 2004, the Barcelona Table was registered as a trademark with the United States Patent and Trademark Office. Knoll's registration for the Barcelona Table, No. 2,894,979, remains in full force and effect and is incontestable. A copy of this registration is attached as Exhibit D.

32. On or about October 19, 2004, the Flat Brno Chair was registered as a trademark with the United States Patent and Trademark Office. Knoll's registration for the Flat Brno Chair, No. 2,894,978, remains in full force and effect and is incontestable. A copy of this registration is attached as Exhibit E.

33. Knoll is the owner of U.S. Trademark Registration No. 772,313 for the mark BARCELONA, which issued on or about June 30, 1964. Said registration remains in full force and effect and is incontestable. A copy of this registration is attached as Exhibit F.

MODERNO, INC. and URBAN MOD, INC.

34. Upon information and belief, Defendants Moderno, Inc., and Urban Mod, Inc., under the direction and control of Mike Saxena, are the marketers and retailers of furniture and related products, much of it embodying "modern design".

35. Defendants Moderno, Inc., and Urban Mod, Inc., under the direction and control of Mike Saxena, through the website www.regencyshop.com, advertise, promote and offer for sale furniture products in the form of the designs that are the subjects of Knoll's aforementioned trademark registrations. A printout of representative pages of Defendants' website is attached as Exhibit G.

36. Defendants Moderno, Inc. and Urban Mod, Inc., under the direction and control of Mike Saxena, have sold and continue to sell products in the form of or

derivatives of the designs that are the subjects of Knoll's aforementioned trademark registrations in New York and throughout the United States.

COUNT I [TRADEMARK INFRINGEMENT]

37. Plaintiff repeats and realleges each allegation in paragraphs 1-36 as if set forth in full herein.

38. Plaintiff has never authorized Defendants to sell reproductions of the Barcelona Chair or products derived from the items in the Barcelona Collection.

39. Upon information and belief, Defendants' acts have been done willfully and intentionally, with full knowledge of Plaintiff's trademark rights.

40. Knoll has given Defendants due notice of Plaintiff's rights but, as indicated by Defendants' current website, Defendants have failed to cease their infringing acts. Defendants' aforesaid activities, especially after notice, are willful. Defendants' continuation of their infringing acts has and will cause Plaintiff irreparable harm and injury.

41. Defendants have improperly sold goods in the form of the designs that are the subject of Knoll's trademark registrations and derived therefrom with the intent to cause confusion and mistake, to deceive and mislead the architects, the furniture trade and the purchasing public and to improperly appropriate the valuable trademark rights of Plaintiff.

42. Defendants' said acts violate Section 32 of the Lanham Act, 15 U.S.C. § 1114.

43. Plaintiff has no adequate remedy at law and is suffering irreparable harm

and damages as a result of the wrongful acts of Defendants in an amount thus far not determined.

COUNT II [FALSE DESIGNATION OF ORIGIN]

44. Plaintiff repeats and realleges each allegation in paragraphs 1-43 as if set forth in full herein.

45. Defendants' efforts to misrepresent themselves as a legitimate source of the items in the Barcelona Collection takes control of the reputation and goodwill of the designs for those items away from Knoll, which owns and is responsible for the goodwill of those designs in the United States.

46. Defendants have improperly sold goods in the form of the designs that are the subject of Knoll's trademark registrations with the intent to cause confusion and mistake, to deceive and mislead the architects, the furniture trade and the purchasing public and to improperly appropriate the valuable trademark rights of Plaintiff.

47. Defendants' said acts violate Section 43 (a) of the Lanham Act, 15 U.S.C. § 1125 (a).

48. Plaintiff has no adequate remedy at law, and is suffering irreparable harm and damages as a result of the wrongful acts of Defendants in an amount thus far not determined.

COUNT III [COMMON LAW UNFAIR COMPETITION]

49. Plaintiff repeats each allegation in paragraphs 1-48 as if set forth in full herein.

50. As a result of Defendants' improper sale of furniture in the form of the designs that are the subject of Knoll's trademark registrations, architects, the furniture trade and the purchasing public are likely to buy Defendants' products in the erroneous belief that they are authorized reproductions of Knoll's trademarked designs or that the furniture items are otherwise associated with Knoll.

51. Upon information and belief, Defendants have intentionally misappropriated the designs that are the subject of Knoll's trademark registrations with the intention of causing confusion, mistake and deception among consumers and the trade as to the source of the goods and with the intent to unfairly profit from Plaintiff's goodwill at Plaintiff's expense.

52. As a result of the foregoing, Defendants' actions constitute unfair competition and misappropriation which have had and will continue to have a detrimental effect on the general consuming public in violation of the common law of the State of New York.

53. Plaintiff has no adequate remedy at law, and is suffering irreparable harm and damages as a result of the wrongful acts of Defendants in an amount thus far not determined.

COUNT IV [INJURY TO BUSINESS REPUTATION AND DILUTION]

54. Plaintiff repeats and realleges each allegation of paragraphs 1-53 hereof, as if fully set forth herein.

55. By reason of the practices and acts set forth above, Defendants are likely to injure Knoll's business reputation and dilute the distinctive quality of Plaintiff's marks, in violation of Section 360-l of the New York General Business Law.

56. These acts of Defendants are without the permission, license or consent of Plaintiff and, unless enjoined by this Court, Defendants will continue these practices and acts, thereby harming Plaintiff's business reputation and causing Plaintiff immediate and irreparable injury.

57. Plaintiff has no adequate remedy at law and is suffering irreparable harm and damages as a result of the wrongful acts of Defendants in an amount thus far not determined.

WHEREFORE, Plaintiff demands:

A. An injunction permanently enjoining and restraining Defendants, their directors, officers, agents, servants, employees, successors, assigns, subsidiaries, related companies, parent companies, licensees, assigns, and all persons in active concert or participation with it:

1. From importing, marketing or selling furniture in the form of the designs that are the subject of Knoll's trademark registrations;

2. From importing, marketing or selling furniture in the form of the designs which are derived from the designs which are the subject of Knoll's trademark registrations;

3. From passing off or otherwise representing to architects, the furniture trade or public in any way that any product sold by Defendants emanates from, is related in source or sponsorship to, or is in any way related to Plaintiff;

4. From injuring Plaintiff's business reputation by diluting the distinctive quality of Plaintiff's products; and

5. From engaging in misappropriation, deceptive trade practices or acts in the conduct of Defendants' business by means of selling products embodying Knoll's trademarked designs or any designs substantially similar thereto;

B. Directing Defendants to deliver to Plaintiff or to destroy all furniture in its possession that is in the form of the designs that are the subject of Knoll's trademark registrations or is derived from the designs that are the subject of Knoll's trademark registrations;

C. Directing Defendants to immediately recall and destroy all of its catalogs showing, advertising or promoting furniture that is in the form of the designs that are the subject of Knoll's trademark registrations or is derived from the designs that are the subject of Knoll's trademark registrations;

D. Directing Defendants to remove all references to or images of furniture that are in the form of the designs that are the subject of Knoll's trademark registrations or is derived from the designs that are the subject of Knoll's trademark registrations from Defendant's internet website;

E. Directing Defendants to account to Plaintiff for all profits resulting from Defendant's infringing activities;

F. Awarding Plaintiff its damages from Defendants' wrongful acts;

G. Awarding Plaintiff three times the amount of Plaintiff's damages or Defendants' profits, whichever is greater;

H. Awarding Plaintiff the cost of this action, as well as reasonable attorneys' fees;

I. Awarding Plaintiff punitive damages as a result of Defendants' wrongful acts;
and;

J. Awarding Plaintiff such other and further relief as the Court may deem just
and proper.

PLAINTIFF DEMANDS A JURY TRIAL AS TO ALL MATTERS TRIABLE BY JURY

GOTTLIEB, RACKMAN & REISMAN, P.C.
Attorneys for Plaintiff
270 Madison Avenue
New York, New York 10016
(212) 684-3900
ggottlieb@grr.com
mmisthal@grr.com
apeikes@grr.com

Dated: October 26, 2011
New York, New York

By:

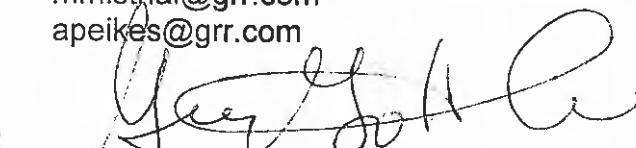

George Gottlieb (GG-5761)
Marc P. Misthal (MM-6636)
Ariel S. Peikes (AP-9157)

EXHIBIT A

Int. Cl. 20

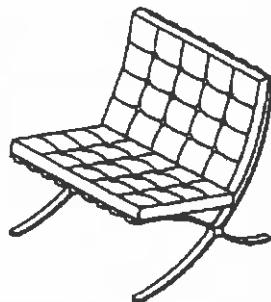
Prior U.S. Cls.: 2, 13, 22, 25, 32 and 50

United States Patent and Trademark Office

Reg. No. 2,893,025

Registered Oct. 12, 2004

TRADEMARK
PRINCIPAL REGISTER



KNOLL, INC. (DELAWARE CORPORATION)
1235 WATER STREET
EAST GREENVILLE, PA 18041

FOR: CHAIRS, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25,
32 AND 50).

FIRST USE 1-1-1954; IN COMMERCE 1-1-1954.

THE MARK CONSISTS OF A CONFIGURATION
OF A CHAIR WITH A METAL FRAME AND
LEATHER CUSHIONS.

SEC. 2(F).

SER. NO. 76-556,817, FILED 10-22-2003.

JAMES A. RAUEN, EXAMINING ATTORNEY

EXHIBIT B

Int. Cl.: 20

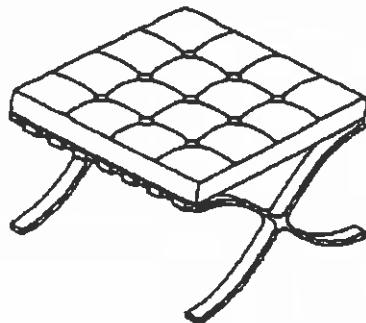
Prior U.S. Cls.: 2, 13, 22, 25, 32 and 50

United States Patent and Trademark Office

Reg. No. 2,894,977

Registered Oct. 19, 2004

TRADEMARK
PRINCIPAL REGISTER



KNOLL, INC. (DELAWARE CORPORATION)
1235 WATER STREET
EAST GREENVILLE, PA 18041

THE MARK CONSISTS OF A CONFIGURATION
OF A STOOL WITH A METAL FRAME SUPPORT-
ING A LEATHER CUSHION.

FOR: STOOLS, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25,
32 AND 50).

SEC. 2(F).

SER. NO. 76-556,816, FILED 10-22-2003.

FIRST USE 1-1-1954; IN COMMERCE 1-1-1954.

JAMES A. RAUEN, EXAMINING ATTORNEY

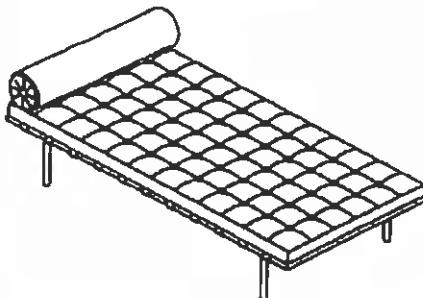
EXHIBIT C

Prior U.S. Cls.: 2, 13, 22, 25, 32 and 50

United States Patent and Trademark Office

Reg. No. 2,894,980
Registered Oct 19, 2004

TRADEMARK
PRINCIPAL REGISTER



KNOLL, INC. (DELAWARE CORPORATION)
1235 WATER STREET
EAST GREENVILLE, PA 18041

FOR: COUCHES, IN CLASS 20 (U.S. CLS. 2, 13, 22,
25, 32 AND 50).

FIRST USE 1-1-1954; IN COMMERCE 1-1-1954.

THE MARK CONSISTS OF A CONFIGURATION
OF A COUCH WITH A METAL FRAME SUPPORT-
ING A LEATHER CUSHION.

SEC. 2(F).

SER. NO. 76-556,824, FILED 10-22-2003.

THEODORE MCBRIDE, EXAMINING ATTORNEY

EXHIBIT D

Int. Cl.: 20

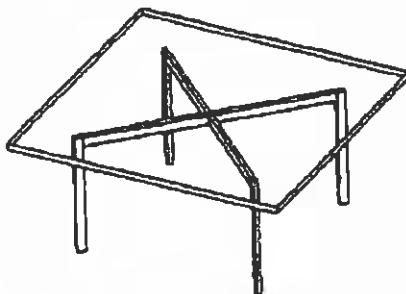
Prior U.S. Cls.: 2, 13, 22, 25, 32 and 50

United States Patent and Trademark Office

Reg. No. 2,894,979

Registered Oct. 19, 2004

TRADEMARK
PRINCIPAL REGISTER



KNOLL, INC. (DELAWARE CORPORATION)
1235 WATER STREET
EAST GREENVILLE, PA 18041

THE MARK CONSISTS OF A CONFIGURATION
OF A TABLE WITH A METAL BASE AND A GLASS
TOP.

FOR: TABLES, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25,
32 AND 50).

SEC. 2(F).

SER. NO. 76-556,821, FILED 10-22-2003.

FIRST USE 1-1-1954; IN COMMERCE 1-1-1954.

JAMES A. RAUEN, EXAMINING ATTORNEY

EXHIBIT E

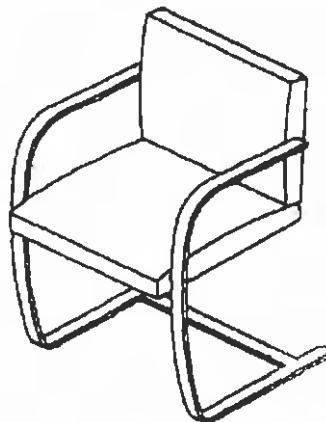
Int. Cl.: 20

Prior U.S. Cls.: 2, 13, 22, 25, 32 and 50

United States Patent and Trademark Office

Reg. No. 2,894,978
Registered Oct. 19, 2004

TRADEMARK
PRINCIPAL REGISTER



KNOLL, INC. (DELAWARE CORPORATION)
1235 WATER STREET
EAST GREENVILLE, PA 18041

FOR: CHAIRS, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25,
32 AND 50).

FIRST USE 1-1-1954; IN COMMERCE 1-1-1954.

THE MARK CONSISTS OF A CONFIGURATION
OF A CHAIR WITH A FLAT METAL FRAME
SUPPORTING A CUSHION.

SEC. 2(F).

SER. NO. 76-556,819, FILED 10-22-2003.

JAMES A. RAUEN, EXAMINING ATTORNEY

EXHIBIT F

PRINCIPAL REGISTER
Trademark

Ser. No. 177,235, filed Sept. 18, 1963

BARCELONA

Drexel Enterprises, Inc. (Delaware corporation)
1690 English St.
High Point, N.C.

For: LIVING ROOM, BEDROOM, AND DINING
ROOM FURNITURE, AND OCCASIONAL TABLES
AND CHAIRS, in CLASS 32.

First use Oct. 19, 1962; in commerce Feb. 27, 1963.

EXHIBIT G

Regency Shop

1-886-776-2880

View now in your cart 0 items

[Home](#)[What's New](#)[Clearance Sale](#)[About](#)[Contact Us](#)[Bar Stools](#)[Chairs / Loungers](#)[Computer Workstations](#)[Dining Sets](#)[Lights and Lamps](#)**Ibiza Chair - Pure**Retail: \$4999.00
Sale: \$345.00
[Click for Details](#)**Ibiza Chair Cushion**Our Price: \$185.00
[Click for Details](#)**Ibiza Coffee Table**Retail: \$4999.00
Sale: \$189.00
[Click for Details](#)[Models/Miniatures](#)**Ibiza Couch**
Retail: \$2495.00
Sale: \$785.00
[Click for Details](#)[Ottomans / Benches](#)[Outdoor Wicker](#)[Sofas / Sectionals](#)[Tables](#)[TV Stands](#)**Ibiza Leather Bench**Retail: \$6999.00
Sale: \$325.00
[Click for Details](#)**Ibiza Ottoman**Retail: \$4995.00
Sale: \$149.00
[Click for Details](#)[View All Products](#)[Shop by Price](#)

Under \$200.00
From \$200.00 to \$400.00
From \$400.00 to \$600.00
From \$600.00 to \$800.00
From \$800.00 to \$1000.00
\$1000.00 and above

Displaying 1 to 6 (of 6 products)

Result Pages: 1

- » [About Us](#)
- » [FAQs & TOS](#)
- » [Privacy Policy](#)
- » [Contact Us](#)
- » [Catalog Feed](#)

New Articles (0)
All Articles (139)
» [Buyer Guides](#) (3)
» [Contemporary Ideas](#) (129)
» [Educational](#) (7)



Copyright 2011, RegencyShop All Rights Reserved

[Home](#) | [Site Map](#) |

Regency Shop provides high quality interpretations of modern classics from Knoll, Gavina, Ercol, Henredon, Herman Miller, Espe, Artek, Saarinen, and others. We respect the original designs and make no claim to provide items from the designers and licensing companies above, which include products like the Barcelona Chair, Eames Lounge Chair, bar stools, Noguchi Table, Le Corbusier products, Yves Klein, Tugendhat, and Tulu Tables, George Nelson Bench, or other items. The items on our site are not manufactured by and are not products of the companies/designers listed above. RegencyShop is in no way affiliated with any of the companies/designers listed above.

[Home](#)[What's New](#)[Clearance Sale](#)[Search](#)
[About](#)[Contact Us](#)**Ibiza Chair - Pure Leather, Stainless Steel**[Bar Stools](#)[Bed in a bag / Comforter Sets](#)[Chairs / Loungers](#)

- [• Lounge Chairs](#)
- [• Office Chairs](#)

[Computer Workstations](#)[Dining Sets](#)[Lights and Lamps](#)[Models/Miniatures](#)[Ottomans / Benches](#)[Outdoor Wicker](#)[Sofas / Sectionals](#)[Tables](#)Retail:
\$1,099.00Sale:
\$345.00Shipping
\$140.00Quantity

ADD TO CART

[TV Stands](#)[View All Products](#)[Shop by Price](#)

- [Under \\$200.00](#)
- [From \\$200.00 to \\$400.00](#)
- [From \\$400.00 to \\$600.00](#)
- [From \\$600.00 to \\$800.00](#)
- [From \\$800.00 to \\$1,000.00](#)
- [\\$1,000.00 and above](#)

- [» About Us](#)
- [» FAQs & TOS](#)
- [» Privacy Policy](#)
- [» Contact Us](#)
- [» Catalog Feed](#)

- [New Articles \(0\)](#)
- [All Articles \(115\)](#)
- [» Buyer Guides](#)
- [» Contemporary Ideas \(106\)](#)
- [» Educational \(7\)](#)

Available Options:Ottoman: Color:

Meticulously handcrafted with fine leather & leather match for the back and sides. Constructed using individual leather panels, each piece cut and hand-sewn. The frame is made from solid stainless steel.

FEATURES

- Genuine TOP-GRADE Leather seating area
- Stable and reliable design
- Stable and strong Stainless Steel frame
- Meets architectural specifications of the original design.

Dimensions:

Chair

height:30"

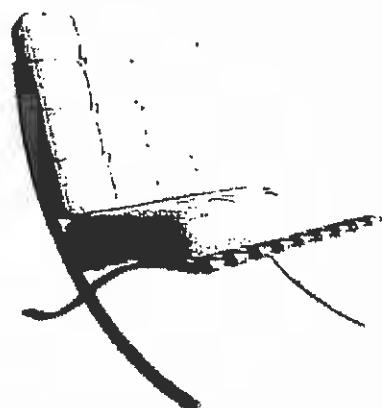
width:30"

depth:30"

Color Options:

White

Black

[Need replacement Cushions? Click here](#)

This item is not an original Barcelona chair, nor is it manufactured by or affiliated with Knoll.

About the Mies van der Rohe Barcelona Chair: So well known is one of the leading pieces of the Design Movement, the Barcelona Chair was designed in 1929. It sits alone, like a jewel in its own crown. And it is one of the most controversial pieces of history still in the world today. Mies van der Rohe revolutionized the furniture industry with his designs and the Bauhaus movement that followed his famous dictum "Form follows function". The Barcelona Chair is the perfect example of his belief. The frame is in the shape of an 'X' and interestingly enough, the 'X' looks like it's occupied—even when it is not. The shape is warped to look as though a weight is hanging down from it. To get that look, every joint of the bent and delicate frame is welded together, as opposed to using straight pieces, easily riveted or screwed together. The chair was introduced at the German Pavilion Barcelona Exhibition and seen by hundreds of Europeans whose enthusiasm grew to epidemic proportions. Everyone who attended an Art Deco exhibition of fine furnishings wanted the Barcelona Chair in their living room. They were right to desire the chair. It was destined to start a revolution in furnishings design. Up to that point, fine furniture was a memory of Louis XIV or XV and soon or very soon, was replaced by upholstery. Barcelona Chairs were covered in leather—rich and thick and tailored—actually quite masculine. And, in spite of that, managed to stir the fancy of even the most delicate feminine tastes.

Mies' Barcelona Chairs turned their heads—made them look at furnishings with a new eye—and they bought it. Perhaps the world was ready for something so markedly different and 1929 was the right time for the debut of something radical. For it was that—in spades. Instead of being round, it was rectangular. Instead of being soft, it was hard. Instead of being a muted rose or beige, it was a hellish rich brown. The Barcelona Chair Mies van der Rohe had given to the world of interior design began a revolution that lasts to this day. Leather chairs and couches are a common occurrence. Straight, rectangular pieces occupy just about every home. Not so much that other styles have disappeared, but that the Modern Movement made a strong beginning and it's not over—in fact it has developed into plastic and oddly shaped pieces that make you wonder how they were created. Mies' Barcelona design is still around through scaling as well as ever they did.

Lowest Price Guarantee*

Guaranteed Lowest Prices

Our prices are the lowest in the industry and our quality is one of the best. Still, if within 10 days of your online purchase at RegencyShop.com, you find the identical product nationally advertised for less by one of our competitors, we will refund to you 100% of the difference!*

Nationally advertised low prices found online must be printed out completely with proof of competitor's name, item name, manufacturer model number and the offer's expiration date clearly visible.

*Refund valid on retail price of item only, not shipping or/and handling charges. Guarantee not valid on competitor close-outs, markdowns, special buys, special promotions, confirmation emails are not accepted in place of invoice or packing slip. Customer must purchase from RegencyShop.com and follow the directions above to be considered for a refund. Please allow 6 - 8 weeks for refund processing.

SHIPPING INFORMATION:

Items in stock typically are shipped within 1 week of payment or sooner. We will send you your tracking number immediately upon shipment.

All of our products are carefully inspected before shipping. However rarely, in-transit damages do occur. Please make a note of any obvious or suspected damage on the delivery receipt BEFORE signing for delivery and BEFORE the driver leaves.

PLEASE FULLY INSPECT YOUR SHIPMENT.

RETURNS:

Damage claims must be reported within 24 hours of delivery. A picture of the damaged item is required, no exceptions. Shipping is non-refundable, buyer pays return shipping. Pre-authorized returns only. Item can only be exchanged for the same item, no refunds are issued.

INTERNATIONAL SHIPPING:

We ship all across the globe. Please contact us for details.

LOCAL PICKUPS

We do offer local pickups in the Los Angeles area. Please contact us to schedule a pickup.

| Retail: | Bulk: | Shipping | Quantity |
|------------|----------|----------|----------------------|
| \$4,000.00 | \$345.00 | \$140.00 | <input type="text"/> |



You may also like:



Ibiza Leather Bench

Our Price: \$385.00

[Click for Details](#)

Customers who bought this product also purchased



Ball Chair



Drop Chair Stool



Bombo Bar Stools

Womb Style Chair & Ottoman



Copyright 2009-2010 Modem, Inc. All Rights Reserved

[Home](#) | [Site Map](#)

Regency Shop provides high quality interpretations of modern classics from Knoll, Cassina, Fritz Hansen, Herman Miller, Euro Atlantic, Saarinen, and others. We respect the original designs and make no claims to provide items from the designers and licensing companies above, which includes products like the Barcelona Chair, Eames Lounge Chair, bar stools, Noguchi Table, Le Corbusier products, Womb Chair, Tulip Chairs and Trip company/designers listed above.

[Search](#)[Home](#)[What's New](#)[Clearance Sale](#)[About](#)[Contact Us](#)

Ibiza Leather Bench

[Bar Stools](#)[Bed in a bag / Comforter Sets](#)[Chairs / Loungers](#)[Computer Workstations](#)[Dining Sets](#)[Lights and Lamps](#)[Models/Miniatures](#)[Ottomans / Benches](#)[Outdoor Wicker](#)[Sofas / Sectionals](#)[Tables](#)[TV Stands](#)[View All Products](#)[Shop by Price](#)[Under \\$200.00](#)[From \\$200.00 to \\$400.00](#)[From \\$400.00 to \\$600.00](#)[From \\$600.00 to \\$800.00](#)[From \\$800.00 to \\$1,000.00](#)[\\$1,000.00 and above](#)[About Us](#)[FAQs & TOS](#)[Privacy Policy](#)[Contact Us](#)[Catalog Feed](#)

Our Price:

\$399.00

Shipping:

\$19.00

Quantity:

1

[ADD TO CART](#)

Available Options:

Color:

FEATURES

- Genuine 100% leather
- Solid steel frame
- Premium cushion construction

Dimensions:

52"W x 19"D x 16"H

Color

Black

White

[New Articles \(0\)](#)[All Articles \(115\)](#)[Buyer Guides](#)[Contemporary Ideas \(108\)](#)[Educational \(7\)](#)**This item is not an original Barcelona bench, nor is it manufactured by or affiliated with Knoll.**

About the original Mies van der Rohe Barcelona bench

His work was clean, orderly and pristine. A master of the Bauhaus, Mies van der Rohe's architecture was the model others studied to attain the perfect proportions and dramatic simplicity that claimed his signature. Then he amazed his colleagues even further with his design for a Barcelona Bench, a scaled down version of his architecture meant to occupy a small space and express his design concept. Did he know how deeply this new version of a坐位 would influence the furniture industry? It did. Furniture companies picked up on his ideas and, in time, New York apartments became the sophisticated epitome of the sleek, fashionable, and unadorned furnishings we have come to think of as "Modern". Architects were next to adopt the style, with crystal appearing in square columns as vases, and coffee tables that matched the streamlined sofa.

Buying a replica of a Mies van der Rohe Barcelona bench is like owning a piece of architectural history. It represents the beginning of an age when van der Rohe led designers to see architecture in terms of pure geometry. His Barcelona house was a plain and simple rectangle, easily understood and adopted to a residential scale, and the furniture industry under Mies' influence, followed suit. His motto, "Form follows function" was the mantra of the day, and the Mies van der Rohe Barcelona bench is the epitome of the dictum. The metal legs are straight, sturdy, and minimalist in their Mies fashion. An unadorned rectangular slab of wood sits atop the legs on the Barcelona Bench, and strapped to the wood is a thick leather cushion. These benches have been reproduced as a white Barcelona bench and a black Barcelona bench, although the original was black and sat in Mies' living room.

The white Barcelona bench would be well placed in a bedroom, the black—appropriate in a study or foyer. Think how interesting one of them might be, used as a coffee table in front of a sofa—either black leather sofa, or perhaps at the end of a black pedestal bed. Although Mies van der Rohe led the Bauhaus seventy-plus years ago, his influence is still felt today in homes, offices and restaurants that enjoy the eminence of a classic, yet modern style. With only a slight difference in materials and scale, Mies would recognize the clean lines and rich materials of his Barcelona bench that led to a revolution in furniture design and lasted through a century.

Lowest Price Guarantee**Guaranteed Lowest Prices**

Our prices are the lowest in the industry and our quality is one of the best. Still, if within 10 days of your online purchase at RegencyShop.com, you find the identical product nationally advertised for less by one of our competitors, we will refund to you 100% of the difference!*

Nationally advertised low prices found online must be printed out completely with proof of competitor's name, item make, manufacturer model number and the offer's expiration date clearly visible.

*Refund valid on retail price of item only, not shipping and/or handling charges. Guarantee not valid on competitor close-outs, markdowns, special buys, special promotions, etc. are not accepted in place of invoice or packing slip. Item must be identical make and model. Truck shop or shipping and bike confirmation below. 6 weeks for refund processing.

SHIPPING INFORMATION:

Items in stock typically are shipped within 1 week of payment or sooner. We will send you your tracking number immediately upon shipment.

All of our products are carefully inspected before shipping. However rarely, in-transit damages do occur. Please make a note of any obvious or suspected damage on the delivery receipt BEFORE signing for delivery and BEFORE the driver leaves.

PLEASE FULLY INSPECT YOUR SHIPMENT.**RETURNS:**

Damage claims must be reported within 24 hours of delivery. A picture of the damaged item is required, no exceptions. Shipping is non-refundable, buyer pays return shipping. Pre-authorized returns only. Item can only be exchanged for the same item, no refunds are issued.

INTERNATIONAL SHIPPING:

We ship all across the globe. Please contact us for details.

LOCAL PICKUPS

We do offer local pickups in the Los Angeles area. Please contact us to schedule a pickup.

Our Price:
\$399.00

Shipping
\$189.00

Quantity

 ADD TO CART

Customers who bought this product also purchased

Bistro Jupiter Table



Eileen Table - Gray



Ibiza Chair - Pure Leather, Stainless Steel



Copyright 2009-2010 Moderno, Inc. All Rights Reserved

[Home](#) | [Site Map](#) |

Regency Shop provides high quality interpretations of modern classics from Knoll, Cassina, Fritz Hansen, Herman Miller, Eero Aarnio, Saarinen, and others. We respect the original designs and make no claims to provide items from the designers and licensing companies above; which includes products like the Barcelona Chair, Eames Lounge Chair, bar stools, Noguchi Table, Le Corbusier products, Womb Chair, Tug Chairs and Tulip chairs, George Nelson Bench, or other items. The items on our site are not manufactured by and are not products of the companies/designers listed above. RegencyShop is in no way affiliated with any of the companies/designers listed above.

[Home](#)[What's New](#)[Clearance Sale](#)[Search](#)[About](#)[Contact Us](#)

Ibiza Chair Cushion

[Bar Stools](#)[Bed in a bag / Comodora Sets](#)[Chairs / Loungers](#)

- » Lounge Chairs
- » Office Chairs

[Computer Workstations](#)[Dining Sets](#)[Lights and Lamps](#)[Models/Miniatures](#)[Ottomans / Benches](#)[Outdoor Wicker](#)[Sofas / Sectionals](#)

Our Price:

\$185.00

Shipping

\$99.00

Quantity

[ADD TO CART](#)[Tables](#)[TV Stands](#)[View All Products](#)[Shop by Price](#)

- Under \$200.00
- From \$200.00 to \$400.00
- From \$400.00 to \$600.00
- From \$600.00 to \$800.00
- From \$800.00 to \$1,000.00
- \$1,000.00 and above

- » [About Us](#)
- » [FAQs & TOS](#)
- » [Privacy Policy](#)
- » [Contact Us](#)
- » [Catalog Feed](#)

- [New Articles \(0\)](#)
- [All Articles \(115\)](#)
- » [Buyer Guides](#)
- » [Contemporary Ideas \(108\)](#)
- » [Educational \(7\)](#)



Available Options:

Color:

PRICED PER SET (SEAT+BACK) Replacement cushions for your barcelona chair. Meticulously handcrafted with fine leather & leather match for the back and sides. High quality leather, crafted with precision.

[Click here for the Ibiza Chair >>](#)

FEATURES

- Genuine TOP-GRADE Leather
- Stable and reliable design

Dimensions:

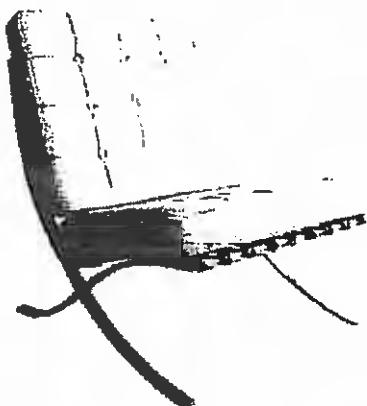
Seat

31 x 23 x 4

Back

31 x 20 x 4

Color Options:

White**Black**

Lowest Price Guarantee*

Guaranteed Lowest Prices

Our prices are the lowest in the industry and our quality is one of the best. Still, if within 10 days of your online purchase at RegencyShop.com, you find the identical product nationally advertised for less by one of our competitors, we will refund to you 100% of the difference!*

Nationally advertised low prices found online must be printed out completely with proof of competitor's name, item make, manufacturer model number and the offer's expiration date clearly visible.

*Refund valid on retail price of item only, not shipping and handling charges. Guarantee not valid on competitor close-outs, markdowns, special buys, special promotions, confirmation emails are not accepted in place of invoice or packing slip. Item must be identical make and model. Must ship via land or online & return. Please allow 8 - 10 weeks for refund processing.

SHIPPING INFORMATION:

Items in stock typically are shipped within 1 week of payment or sooner. We will send you your tracking number immediately upon shipment.

All of our products are carefully inspected before shipping. However rarely, in-transit damages do occur. Please make a note of any obvious or suspected damage on the delivery receipt BEFORE signing for delivery and BEFORE the driver leaves.

PLEASE FULLY INSPECT YOUR SHIPMENT.

RETURNS:

Damage claims must be reported within 24 hours of delivery. A picture of the damaged item is required, no exceptions. Shipping is non-refundable, buyer pays return shipping. Pre-authorized returns only. Item can only be exchanged for the same item, no refunds are issued.

INTERNATIONAL SHIPPING:

We ship all across the globe. Please contact us for details.

LOCAL PICKUPS

We do offer local pickups in the Los Angeles area. Please contact us to schedule a pickup.

Our Price:
\$185.00

Shipping
\$99.00

Quantity

 ADD TO CART

Customers who bought this product also purchased

Portland Bar Stools



Copyright 2005-2010 Moderno, Inc. All Rights Reserved

[Home](#) | [Site Map](#) | [Feedback](#)

Regency Shop provides high quality interpretations of modern classics from Knoll, Cassina, Eric Hansen, Herman Miller, Euro Style, Saarinen, and others. We respect the original designs and make no claims to provide Tables, George Nelson Bench, or other items. The items on our site are not manufactured by and are not products of the companies/designers listed above. RegencyShop is in no way affiliated with any of the companies/designers listed above.

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KNOLL, INC.,

Plaintiff,

No . 11 cv. 0488 (AKH)

-against-

MODERNO, INC. AND URBAN MOD, INC. d/b/a REGENCY SHOP,
AND MIKE SAXENA

Defendants.

AMENDED ANSWER OF DEFENDANTS MODERNO, INC. AND URBAN MOD,
INC. d/b/a REGENCY SHOP, AND MIKE SAXENA TO PLAINTIFF KNOLL,
INC.'S AMENDED COMPLAINT

Defendants MODERNO, INC. AND URBAN MOD, INC. d/b/a REGENCY
SHOP, AND MIKE SAXENA (herein jointly and severally referred to as "Defendants")
hereby offer their Amended Answer to Plaintiff KNOLL, INC.'S ("Knoll") AMENDED
COMPLAINT.

1. Admit that this action purports to be brought under the statutes stated in Paragraph 1.
2. Admit that Paragraph 2 alleges that the Court has subject matter jurisdiction over the claims asserted.
3. Admit that Knoll claims to be a Delaware corporation but deny that Knoll has a principal place of business in New York.
4. Deny that Knoll is a leading designer of branded furniture and aver that Knoll mostly or entirely buys designs from third parties.
5. Admit that Knoll alleges its belief that design is good business but deny that Knoll has ever been recognized as a leading designer of furniture.
6. Deny that Knoll designed most or all of the referenced products.
- 7(a) Deny that Moderno is now doing any business related to the subject matter of this action.

- 7(b) Admitted.
8. Admit that Defendant Mike Saxena resides at the stated address and deny the remainder of the allegations of Paragraph 8.
9. Admitted.
10. Denied.
11. Defendants lack personal knowledge of the alleged facts.
12. Defendants lack personal knowledge of the alleged facts
13. Defendants lack personal knowledge of the alleged facts.
14. Defendants lack personal knowledge of the alleged facts.
15. Defendants admit that Ludwig Meis Van der Rohe and Lillian Reich are generally acknowledged as the designers of the said chair.
16. Defendants lack knowledge as to whether Van der Rohe designed the said stool by himself, as alleged, or with one or more other persons.
17. Defendants lack knowledge as to whether Van der Rohe designed the said couch by himself, as alleged, or with one or more other persons.
18. Defendants lack personal knowledge of the alleged facts.
19. Defendants lack knowledge as to whether Van der Rohe designed the said chair by himself, as alleged, or with one or more other persons.
20. Defendants lack knowledge as to whether Van der Rohe designed the said table by himself, as alleged, or with one or more other persons.
21. Defendants deny that Knoll acquired or has any rights in the “design[s]” of the said pieces of furniture, admit that Knoll had no involvement of any kind in the design of any of the said furniture pieces, and aver that the designs are in the public domain.
22. Denied.
23. Denied and aver that the items are almost always identified and associated with van der Rohe and in certain cases Lillian Reich.
24. Admit that Knoll alleges that the works of Ludwig Mies Van der Rohe may be found in certain museums.

25. Deny that the said museum identifies Knoll as “the source”, or always as the source, for said collection, and aver that Paragraph 25 alleges that some pieces of the collection may have been at the museum since before Knoll claims to have acquired any rights therein.
26. Defendants: decline to admit the allegations of the first sentence, as the words “throughout the United States and internationally” are imprecise and Defendants cannot answer based on personal knowledge; aver that Knoll’s website speaks for itself; and lack knowledge as to the allegations of the third sentence.
27. Defendants deny the allegation and aver that dozens if not hundreds of websites unrelated to Knoll offer reproductions of the Ludwig Mies van der Rohe designs referenced in paragraphs 15, 16, 17, 19, and 20 of the Amended Complaint. Defendants hereby incorporate by reference web pages attached as Exhibit A hereto as well as web pages that are available to the public on the Internet by inserting search terms such as, *inter alia*, “Mies furniture replicas”, “Barcelona chair replicas”, or “Mies chair.” Defendants further incorporate by reference Parts 1 through 8 of the Exhibit to the Declaration of Mike Saxena in Support of Defendants’ Motion to Dismiss (DKT. 15).
28. Defendants aver that the records of the Patent and Trademark Office speak for themselves.
29. Defendants do not herein respond to any legal assertions or conclusions alleged directly or by implication by Knoll, and aver only that the records of the Patent and Trademark Office speak for themselves.
30. Defendants do not herein respond to any legal assertions or conclusions alleged directly or by implication by Knoll, and aver only that the records of the Patent and Trademark Office speak for themselves.
31. Defendants do not herein respond to any legal assertions or conclusions alleged directly or by implication by Knoll, and aver only that the records of the Patent and Trademark Office speak for themselves.
32. Defendants do not herein respond to any legal assertions or conclusions alleged directly or by implication by Knoll, and aver only that the records of the Patent and Trademark Office speak for themselves.
33. Defendants do not herein respond to any legal assertions or conclusions alleged directly or by implication by Knoll, and aver only that the records of the Patent and Trademark Office speak for themselves.
34. Defendants do not accept the characterization of their business by Knoll and aver that the Regencyshop.com website speaks for itself.

35. Denied. Defendants sell nothing that is subject to any valid trademark right Knoll may possess. Knoll's Exhibit G was not the operative web page on Regencyshop.com at the time Knoll filed its complaint herein. The correct web pages are attached as Exhibit B. Defendants further aver that no rational person viewing the Regencyshop.com website could conceivably be misled into thinking that Regencyshop.com sells products sourced from Knoll or that, *inter alia*, there is any affiliation or relationship whatsoever between Knoll and Defendants.
36. Denied. Defendants sell nothing that is subject to any valid trademark right Knoll may possess.
37. Defendants repeat their responses as set forth in 1-36 above.
38. Denied to the extent that Knoll is alleging or implying that Defendants require its permission to sell public domain products.
39. Defendants deny having knowledge that Knoll possesses valid trademark rights in any product offered for sale on Regencyshop.com, and aver that Defendants have a good faith belief that Knoll does not possess, and knows it does not possess, any valid trademark rights in any products offered for sale by Regencyshop.com.
40. See Answer to 39 above. Defendants deny that Knoll could suffer or is threatened with any harm, including irreparable harm, by virtue of any activities of the Defendants. On information and belief, persons who buy from websites offering inexpensive replicas of Mies designs do so because they do not wish Knoll to be the source of their purchase.
41. Denied.
42. Denied.
43. Denied.
44. Defendants repeat their responses as set forth in 1-43 above.
45. Denied.
46. Denied.
47. Denied.
48. Denied.
49. Defendants repeat their responses as set forth in 1-48 above.
50. Denied.

51. Denied.
52. Denied.
53. Denied
54. Defendants repeat their responses as set forth in 1-53 above.
55. Denied.
56. Denied.
57. Denied.

AFFIRMATIVE DEFENSES

1. None of the counts for relief asserted by Knoll state a claim upon which relief may be granted.
2. The designs that Knoll seeks to enforce as trademarks are functional and unpatented and the public may not be prevented from freely copying and using them.
3. The Amended Complaint fails to allege or specify any non-functional aspects of the allegedly trademark-protected designs, and/or insufficiently does so.
4. Defendants have inserted disclaimers into relevant pages of Regencyshop.com that render it impossible for any rational consumer to be misled or confused, or likely to be misled or confused, into thinking that Defendants' products, sold under their IBIZA trademark, come from Knoll or that Defendants have any affiliation or other business arrangement with Knoll.
5. Knoll has abandoned and is estopped from asserting, whatever trademark rights it claims to have in the designs of the alleged, so-called Barcelona furniture, in that, on information and belief, for decades, it disclaimed ownership of trademark rights in said designs and/or did not enforce or effectively enforce said rights in the face of many companies selling, without license from Knoll, the same types of replicas that are being offered for sale on dozens if not hundreds of websites today, including Regencyshop.com.
6. The allegedly trademark-protected designs were in the public domain prior to the date they were allegedly acquired by Knoll.

7. This suit is barred by laches.
8. On information and belief, the allegedly trademark-protected designs were in part designed by Lillian Reich and Knoll has failed to allege that it acquired rights from her as it claims it acquired rights from Ludwig Mies van der Rohe.
9. Any use by Defendants of Knoll's alleged trademarks was and is a protected fair use under the Lanham Act.

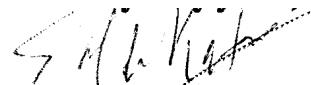
WHEREFORE, Defendants respectfully pray that the Court enter judgment for Defendants, setting forth that:

1. The trademark registrations Defendants are alleged to have infringed are invalid;
2. Defendants have never offered, and are not now offering, goods that could cause confusion or a likelihood of confusion with any of the trademarks asserted by Knoll in this action, and have not infringed any such trademarks;
3. Defendants have never engaged in any action that would threaten, and are not now engaging in any activity that would threaten, Defendants with any harm, including irreparable harm;
4. The allegedly trademark-protected designs are functional and in the public domain;
5. Any trademark rights in the designs in question were abandoned by Knoll or a predecessor company;
6. Knoll shall pay the costs of this action;
7. This is an "exceptional case" within the meaning of 15 U.S.C. §1117(a) and Defendants shall be awarded their attorneys fees.

Defendants further pray for such other and further relief as the Court may find just and proper in the premises.

Dated: November 30, 2011

Respectfully submitted,
Katsh & Associates LLC



By: _____

Salem M. Katsh

64 Main Street
Hastings on Hudson
New York, 10706
914.231.7840

Cell. 646 712 1347
Fax. 646 417 5777
skatsh@katshlaw.com
Attorneys for Defendants

EXHIBIT A



mies furniture replicas



Search

About 4,840,000 results (0.46 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY
Change location

All results

Sites with images

Related searches

More search tools

Ads - Why these ads?

Satisfaction Guaranteed. Only \$699
Free Shipping. Call 1-800-993-0903

Barcelona Furniture

www.target.com

Barcelona Furniture Online.
Shop Target.com.

Chair Barcelona

www.walmart.com/Furniture

walmart.com is rated
Decorate Your Home At Walmart.
Chair Barcelona

Exposition Chair \$999.00

stores.advancedinteriordesigns.com
In-stock, Quick Ship, 5Day Delivery
Buy 2 Get 5% off, Buy 4 Get 10%

Barcelona Chair Wholesale

www.aliexpress.com
1M+ Products at up to 80% Off. Free
Shipping Available. Order Online!

Barcelona Chairs

www.moderncollections.com/Save-Now
Premium Quality Barcelona Chairs.
Affordable Pricing & Free Shipping!

Furniture | Overstock.com

www.overstock.com/Furniture
overstock.com is rated
Big Savings on Quality Furniture.
Free Shipping, Buy Now & Save!

Discount Modern Furniture

www.greatdealfurniture.com
We have the lowest price guaranteed
Unique, hard to find items on sale

See your ad here »

Table Mies - Get Free S&H + Pay No Sales Tax

www.bauhaus2yourhouse.com/Tables

Shop Modern Classic Furniture.

Gordon Intl Mies Designs | GordonInternational.com

www.gordoninternational.com

Mies Van der Rohe Classics fine 20th C. modern furniture

Danish Modern Wholesaler | controlbrand.com

www.controlbrand.com

Finn Juhls and Saarinen Classics Furniture, Lighting Wholesale

Modern classic and bauhaus design furniture reproductions by le ...

www.steelform.com/

Modern Classic and Bauhaus Designer Furniture from Italy. steelform reproductions of
Bauhaus and modern classic designs by Le Corbusier, Mies van der ...

Modern Classic, Mid-Century Modern Furniture by Eileen Gray, Eero ...

www.europfurniture.com/pages/mid_century_modern.../7.php

EuroFurniture offers the best in mid century Modern Classic reproduction furniture by
Mies van der Rohe, Eileen Gray, Le Corbusier, Eero Saarinen, Rene ...

IBIZA CHAIR *Only \$345 - HIGH QUALITY* barcelona chair replica ...

www.regencyshop.com/p63/ibiza-Chair.../product_info.html

Even as replicas, Mies would recognize the clean lines and rich materials of his chair
that led to a revolution in furniture design and lasted through a century. ...

Reproduction Barcelona Chair - Modern Furniture & Contemporary ...

www.modernfurnitureclassics.com/index.php/main.../Title%204

Reproduction Barcelona Chair - The Knoll or Knock off Debate ... the market; the only
chair to bare an imprint of the Mies signature, and the only one that comes ...

Replica Mies Van der Rohe Barcelona Chair - Aniline Leather From ...



▶ 1:19

www.youtube.com/watch?v=bH-4aYemWNK

Jun 1, 2011 - 1 min - Uploaded by mattblattfurniture

See it here: http://www.mattblatt.com.au/Replica-Lounge-Chairs
/Replica-Mies- Van-der-Rohe-B ...

Replica Mies Van der Rohe Barcelona Leather Chair - Deluxe From ...



▶ 1:12

www.youtube.com/watch?v=_L0CmVZdNsg

Jun 7, 2011 - 1 min - Uploaded by mattblattfurniture

See it here: http://www.mattblatt.com.au/Replica-Lounge-Chairs
/Replica-Mies- Van-der-Rohe-B ...

More videos for mies furniture replicas »

Reproduction Of Mies Van Der Rohe Furniture products, buy ...

www.alibaba.com - Products > Furniture > Other Furniture

Reproduction Of Mies Van Der Rohe Furniture, Find complete details about

Reproduction Furniture from PROIEZIONE. You may also find other Reproduction ...

Ludwig Mies van der Rohe Brno Chair (replica) - Chairs - Furniture

nlini.com/.../ludwig-mies-van-der-rohe-brno-stol-replika.html?__...

Ludwig Mies Van Der Rohe Brno Chair (replica) Brno Chair - designed by Ludwig Mies
van der Rohe is a modern furniture classic. Ludwig Mies van der Rohe ...

Barcelona chair - Wikipedia, the free encyclopedia

en.wikipedia.org/wiki/Barcelona_chair

His first patent on a furniture design was issued in 1927 and his last in 1937. ... The
functional design and elements of it that were patented by Mies in Germany, Spain and
the ... Despite these trademarks, a large replica market continues. ...

[Ludwig Mies van der Rohe- Designer Furniture, Replica Furniture ...](#)

www.ie98.com/Ludwig.htm

About Replica Designer Furniture, Replica Designer Furniture Show Room · Replica Designer Furniture ... Ludwig Mies van der Rohe (1886-1969 German) , ...

[Shopping results for mies furniture replicas](#)

[Sixties Furniture, Mies Van Der Rohe, Barcelona Chairs ...](#)

\$14.99 - AllPosters.com

 [Sixties furniture, mies van der rohe, barcelona chairs ...](#)

\$19.99 - Amazon.com

[Mies Van Der Rohe Reproduction Barcelona Chair - All ...](#)

\$699.00 - Manhattan Home Design

1 2 3 4 5 6 7 8 9 10 [Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#)

[Advertising Programs](#)

[Business Solutions](#)

[Privacy](#)

[+Google](#)

[About Google](#)

+You Web Images Videos Maps News Gmail MoreSign in

mies furniture replicas

**Search**

Page 2 of about 4,840,000 results (0.19 seconds)

EverythingImagesMapsVideosNewsShoppingMore**Hastings-on-Hudson, NY**
Change location**All results**Sites with imagesRelated searchesMore search toolsAds - Why these ads?Exposition Chair \$999.00stores.advancedinteriordesigns.com

In-stock, Quick Ship, 5Day Delivery Buy 2 Get 5% off, Buy 4 Get 10%

Get Free S&H + Pay No Sales Tax!
Shop Modern Classic Furniture.Barcelona Chair & Ottoman - Satisfaction Guaranteedwww.eternitymodern.com

Only \$699 Free Shipping. Call 1-800-993-0903

Gordon Intl Mies Designs
www.gordoninternational.com
Mies Van der Rohe Classics
fine 20th C. modern furnitureBarcelona Furniture | Target.comwww.target.com

Barcelona Furniture Online. Shop Target.com.

Bed & Bath - Furniture - Kitchen and Dining - Patio Furniture

Country Willow Furniturewww.countrywillow.comVoted Best Furniture Store 2011.
Storewide Sale. Savings to 50%Replica Mies van der Rohe Barcelona Leather Chair - Standard ...

▶ 0:54

www.youtube.com/watch?v=JW-N6n9kqlw

Jun 1, 2011 - 54 sec - Uploaded by mattblattfurniture

See it here: http://www.mattblatt.com.au/Replica-Lounge-Chairs/Replica-Mies-van-der-Rohe-B...Barcelona Chair at Amazonwww.amazon.com/furnitureamazon.com is rated
Low Prices on Barcelona chair
Free Shipping on Qualified OrdersReplica Mies van der Rohe Barcelona Leather Daybed - Premium ...

▶ 0:48

www.youtube.com/watch?v=c9Em5eG2h-8

Jun 7, 2011 - 48 sec - Uploaded by mattblattfurniture

See it here: http://www.mattblatt.com.au/Day-Bed/Replica-Mies-van-der-Rohe-Barcelona-Leath...More videos for mies furniture replicas »Danish Modern Wholesalerwww.controlbrand.comFinn Juhls and Saannen Classics
Furniture, Lighting WholesaleSwanky Rooms Sales Figures Show Singletons are Buying Sexy ...www.prweb.com/releases/2011/7/prweb8623593.htmJul 8, 2011 - Image conscious singletons are turning to designer furniture replicas to ...
style chair, originally designed in the 1920s by Mies Van Der Rohe.Downtown Furniture Incwww.downtownfurnitureny.comHuge Selections, Amazing Discounts
Exclusive Free Delivery & Assembly!
165 Grand St, New York, NYMies van der Rohe - Exhibition Chairwww.modernclassics.com/.../Mies-van-der-Rohe-Exhibition-Chair-p2...Authentic reproduction of the classic Mies van der Rohe Barcelona Chair. ... Modern
Classics - Mid Century Modern Furniture Reproductions. Mid Century ...Pottery Barn® Furniturewww.potterybarn.comFind Quality Furniture in Classic
Designs & More at Pottery Barn®.Replica Furniture Mies Van Der Rohe | Matt Blattwww.mattblatt.com.au › Replica FurnitureBringing quality replica furniture to everyone is what Matt Blatt is all about. Click now to
buy a replica Mies Van Der Rohe so you don't compromise style ...Designer Furniture Salewww.onekingslane.comSave Up To 70% On Furniture From
Top Designers - Join Now For Free!Mies Van Der Rohe Furniture Replica | Furniture Designswww.furniture.com/tag/mies-van-der-rohe-furniture-replicaJul 28, 2011 - Mies van der Rohe Furniture. Mies van der Rohe: Ludwig Mies van der
Rohe is one of the masters of modern architecture. Famous for his ...See your ad here »Barcelona Lounge Chair: Reproduction or Knoll? - Design Addict For...www.designaddict.com/design_addict/forums/index.cfm/.../251/Oct 29, 2011 - I am looking for a Mies Barcelona Lounge Chair & Ottoman. There seem
to be several places on the web selling Italian made reproductions that ...Barcelona Chair - Buy Mies van der Rohe designs and Barcelona ...www.milandirect.co.uk/shop/category/barcelona-furniture/18 PRODUCTS – Buy from UK's Largest Supplier of Barcelona Chair - Buy Mies van der
Rohe ... Eames Furniture Replica · Barcelona Furniture · Dining Chairs ...Mies Van Der Rohe | Modern Furniture | Modern Classic Furniture ...www.modernfurnituredecor.com/miesinspired.htmlMies Van Der Rohe - Modern Furniture - Modern Classics. Modern Classic Inspired
Designs. Shop By: Select, Brand, Designer. JOIN Our Mailing List! E-mail: ...

[ExpositionT Coffee Table | Pavilion Table, Designer Furniture ...](#)

[www.sexylfurnishings.com](#) › bar / lounge furniture › by category

Mies Coffee Table, Mies van der Rohe **furniture**, Designer Furniture Reproductions, Marcel Breuer, Modern Tables, and More at SexyFurnishings.com.

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#)

[Advertising Programs](#)

[Business Solutions](#)

[Privacy](#)

[+Google](#)

[About Google](#)

+You Web Images Videos Maps News Gmail More

[Sign in](#)



mies furniture replicas

Search

Page 3 of about 4,840,000 results (0.15 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY
Change location

All results

Sites with images

Related searches

More search tools

[Ads](#) - Why these ads?

[Chair Barcelona - Save On Furniture At Walmart.](#)

www.walmart.com/Furniture

walmart.com is rated ★★★★★ 842 reviews

Chair Barcelona

Pavillion Chair Reproduction.
Factory Direct: Save 15% Now!

[Table Mies - Pay No Sales Tax + Get Free S&H](#)

www.bauhaus2yourhouse.com/Tables

Shop Modern Classic Furniture.

[Mies Furniture](#)
furniture.beso.com
Discover Mies Furniture
up to 80% Off. Top Styles, Brands.

[Gordon Intl Mies Designs | GordonInternational.com](#)

www.gordoninternational.com

Mies Van der Rohe Classics fine 20th C. modern furniture

[Furniture at JCPenney](#)
www.jcpenny.com/Furniture
jcpenny.com is rated
Save on Our Wide Selection of
Furniture for Every Room. Buy Now!

[ExpositionT Coffee Table | Pavilion Table ... - Mod Outdoor Furniture](#)

www.modoutdoorfurniture.com/ShoppingCart.asp?ProductCode...

Mies Coffee Table, Mies van der Rohe furniture, Designer Furniture Reproductions, Marcel Breuer, Modern Tables, and More at SexyFurnishings.com.

[Barcelona chair](#)
barcelonachair.shopcompare.net
Bestselling Barcelona chair.
Compare Barcelona chair Deals!

[Replica Mies van der Rohe 'Brno' Chair - Compare Prices and Deals ...](#)

www.myshopping.com.au/ZM--1186466038_Furniture

Buy Replica Mies van der Rohe 'Brno' Chair for \$539 or Compare prices of 14307 products in Furniture from 131 Online Stores in Australia. Save with ...

[Modern Furniture Design](#)
www.furnitureseen.com
Wegner,Noguchi,Panton,Dixon,Bertoia
Starck,Baas&more in 1 place online

[Classic modern furniture designs inspired by Verner Panton ...](#)

www.puremodern.com/Modern...Furniture/Modern-Reproductions

Reproduction furniture has long been a way for consumers to enjoy timeless design ...
Classic designs inspired by Verner Panton, Charles Eames, Mies Van Der ...

[Chairs Barcelona: Cheap](#)
www.nextag.com
Everyone Wants to Pay a Low Price.
Best Value for Chairs Barcelona!

[ludwig-mies-van-der-rohe | modern-classic-reproductions | what-can...](#)

www.designstudiorfurniture.com/...reproductions/ludwig-mies-van-de...

Mies van der Rohe's furniture is known for fine craftsmanship, a mix of traditional luxurious fabrics (like leather) combined with modern chrome frames, and a ...

[Federalist Furniture](#)
www.thefederalistonline.com
Handmade 18th Century
Reproduction Furniture

[20th Century Furniture Design: The Scoop on Licensed Reproductions...](#)

www.apartmenttherapy.com/...licensed-reproductions-reissues-buyer...

Sep 28, 2010 – Knockoffs are easy to find — In New York City, White Furniture specializes in vintage pieces and inexpensive reproductions of popular classics. ...

[Barcelona Chair Wholesale](#)
chairs.bizrate.com
Explore 200+ Chair Choices.
Save on Barcelona Chair Wholesale!

[Our reproductions are inspired by Mies Van Der Rohe - Shenzhen ...](#)

www.freeroom.cn/designers/mies-van-der-rohe.html

"Our reproductions are inspired by Mies Van Der Rohe ,here are some ... infused with the same affinity for balance and a sleek visual form as his furniture. ...

See your ad here »

[Barcelona Chair - Buy the Mies van der Rohe & Barcelona Sofa ...](#)

www.milanidirect.com.au/shop/category/barcelona-furniture/

24 PRODUCTS – Milan Direct smashes the competition across our range of Mies van der Rohe and Barcelona Sofa replica furniture at Australia's best prices ...

[The New York Times > Home & Garden > Knocking Off the Knockoffs](#)

www.nytimes.com › Home & Garden

Oct 28, 2004 – Devotees of midcentury modernist furniture who want to furnish their ...
(Knoll reproductions have Mies's signature stamped into the frame.) ...

[replica modern classic furniture Ludwig Mies Van der Rohe ...](#)

products.eeworldtradefair.com/... - India

replica modern classic furniture Ludwig Mies Van der Rohe Barcelona stool Ottoman Manufacturer- Get replica modern classic furniture Ludwig Mies Van der ...

[Discount Modern Furniture, Retro Furniture for Home, Office ...](#)

www.gibraltarfurniture.com/

Shop Discount Modern Furniture from the Premier Online Retailer for Your Home, ... showcases original and ultra high quality **reproduction** classics from Europe, ... George Nelson, Ludwig Mies van der Rohe, Marcel Breuer, Le Corbusier, ...

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11 12

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#)

[Advertising Programs](#)

[Business Solutions](#)

[Privacy](#)

[+Google](#)

[About Google](#)

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 4 of about 4,840,000 results (0.33 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY
Change location

All results

Sites with images
Related searches

More search tools

Ads - Why these ads?

[Table Mies - Pay No Sales Tax + Get Free S&H](#)

www.bauhaus2yourhouse.com/Tables

Shop Modern Classic Furniture.

[Barcelona Chairs | ModernCollections.com](#)

www.moderncollections.com/Save-Now

Premium Quality Barcelona Chairs. Affordable Pricing & Free Shipping!

[In-Stock Items | Mid Century Modern Furniture Reproductions ...](#)

www.modernclassics.com/modernclassics-instock.html

Mid-Century Modern Furniture reproduction - Mies van der Rohe daybed sofa. Mies van der Rohe, Daybed Sofa, Black, 2. Mid-Century Modern Furniture ...

[Barcelona Chairs, The Barcelona Chair by Mies Van der Rohe](#)

www.barcelonachairs.net/

History tells us that Mies van der Rohe, the architect of the German Pavillion at the ... for a comfortable rest on a nice piece of furniture when visiting the Pavillion. ... Despite Knoll's trademarks, a large replica market is flourishing, even for the ...

[Replica Mies van der Rohe Barcelona Leather Chair - Standard ...](#)

www.youtube.com/watch?v=JW-N6n9kqlw

Jun 1, 2011 -- See it here: <http://www.mattblatt.com.au/Replica-Lounge-Chairs/Replica-Mies-van-der-Rohe-B...> Matt Blatt provides interesting furniture, ...

[Vintage Furniture – Real or Fake? Mies van der Rohe's Barcelona ...](#)

jetsetrv8r.wordpress.com/.../vintage-furniture—real-or-fake-mies-v...

Oct 26, 2008 – Mies van der Rohe's Barcelona Chair. My "Real or Fake" series on vintage furniture is, by far, the most popular draw to the JetSetRnv8r site. ...

[Swivel UK - Modern Classic Furniture](#)

www.swiveluk.com/ - United Kingdom

The highest quality reproductions of modern classic furniture by all the Bauhaus ... Le Corbusier, Eileen Gray Mies Van der Rohe, Poul Kjaerholm and more.

[Replica Mies van der Rohe 'Brno' Chair | Replica Furniture | Sokol ...](#)

www.sokol.com.au/.../replica-furniture/replica-mies-van-der-rohe-br...

The Brno chair was originally designed in 1930 for the Tugendhat House in Brno, Czchoslovakia. To this day it is the most elegant and luxurious chair of its ...

[Replica Furniture Mies Van Der Rohe Black | Matt Blatt](#)

www.mattblatt.com.au/Replica+Furniture+Mies+Van+Der+Rohe

Bringing quality replica furniture to everyone is at Matt Blatt is all about. Click now to buy a Black replica Mies Van Der Rohe so you don't compromise ...

[mies furniture - Directory Listings](#)

instraportal.com/Directory-Listings/mies-furniture/

Mies Van Der Rohe Barcelona Chair, Modern Classic furniture. ... A meticulous reproduction of the original Mies Van der Rohe Pavilion Chair first introduced in ...

[Replica Mies Van der Rohe Barcelona Stool - Black Leather ...](#)

www.tommyswiss.com.au/store/index.php?main_page...10...

Tommy Swiss™ Designer Furniture and Homeware Replica Mies Van der Rohe
Barcelona Stool - Black Leather [RF001S-B] - Replica Mies Van der Rohe ...

[Replica Mies Van Der Rohe Barcelona Bench ... - Connect Furniture](#)

connectfurniture.com.au/.../LFINTRMVDRBBL84_Replica-Mies-Va...

Find the Replica Mies Van Der Rohe Barcelona Bench - Long you really want at
ConnectFurniture - Australia's #1 online furniture website.

[Ad - Why this ad?](#)

[Bassett Furniture Sale](#)

www.bassettfurniture.com/sale

Save Up to 25% This Week. Find Your Local Store Now!

Find a Store - Win a \$500 Gift Card - Clearance - Subscribe for Discounts

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11 12 13

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#)

[Advertising Programs](#)

[Business Solutions](#)

[Privacy](#)

[+Google](#)

[About Google](#)

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 5 of about 4,840,000 results (0.18 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

Furniture Replicas | Bargain Grove

www.bargaininggrove.com/furniture/replicas/

Feb 23, 2011 – Sale, Coupons on Modern Bargain Furniture, Home Decor, Appliances ... Mies Van Der Rohe Chair Replica Sale at GibraltarFurniture ...

True replicas of Bauhaus furniture Mies Van Der Rohe, Le Corbusie...

www.igrandimaestri.it/eng/in_vetrina.html

I Grandi Maestri del Design S.r.l. offers wholly made in Italy true replicas of Bauhaus furniture... armchairs, sofas, chairs and tables designed by Mies Van Der ...

Hidesandco.com Furniture Interior design - Shop for hidesandco ...

www.thisnext.com/browse/hidesandco.com.../furniture/interior-design...

Barcelona Day Bed designed by Mies van der Rohe. Hides & Co. offers luxury within reach modern classic furniture reproductions, covered in premium ...

The Barcelona Chair

www.squidoo.com › Arts & Design › Interior Design › Home Decor

The Barcelona Chair is one of the most recognisable pieces of furniture in the world. The chair was designed by the Bauhaus architect, Mies Van Der Rohe in. ... There are many reproduction Barcelona Chairs on the market - some of which ...

Mies furniture | folkd.com

www.folkd.com/tag/Mies+furniture

Results 1 - 10 of 31 – madestag11: Always dreamt of having your own Mies van der Rohe Barcelona Chair and Barcelona Furniture? The Milan Direct replica Mies ...

skate furniture,discount furniture,wholesale furniture,replica ...

www.tradetuber.com/chinesereplicas/.../skate_furniture_d... - Hong Kong

skate furniture,discount furniture,wholesale furniture,replica furniture [Mar ... Pavilion chair, rohe chaise lounge, brno flat chair by mies van der rohe. ...

MIES VAN DER ROHE , BY PHILIP JOHNSON MOMA 1947 - \$49.99 ...

www.populuxbooks.com/index.php?main_page=product...

187 ILLUSTRATIONS- PHOTOS OF MIES'S BUILDINGS, INTERIORS, FURNITURE. REPRODUCTIONS OF HIS PLANS AND SKETCHES FOR PROJECTS ARE ...

replica moden classic furniture Eames Lounge Chair and Ottoman ...

www.ecvv.com/product/3086646.html

High quality replica moden classic furniture Eames Lounge Chair and ... Chair and Ottoman, Barcelona Chair and Ottoman designed by Ludwig Mies Van der ...

Darren Palmer adds to the replica debate - Interiors Addict

theinteriorsaddict.com/post/.../darren-palmer-replica-furniture

Nov 18, 2011 – Darren Palmer adds to the replica debate In this guest post, interior ... who are affected by the replica furniture market like Eames, Mies Van der ...

Ludwig Mies van der Rohe : Prime Classic Design Inc., modern ...

www.primeclassicdesign.com/ludwig-mies-van-der-rohe-ezp-2.html

Mies van der Rohe We offer the finest reproductions of Mies van der Rohe furniture on the market. Using only the finest material available in combination with ...

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 6 of about 4,840,000 results (0.14 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

[Mies van der Rohe barcelona chair - chrome plated](#)

www.xinhuayun.com/.../Mies-van-der-Rohe-barcelona-chair---chro...

modern classic furniture reproductions ... Created by Ludwig Mies van der Rohe for the German Pavilion at the 1929 Barcelona Exposition, the Barcelona chair ...

[China Best \(HK\) company limited - quality replica modern classic ...](#)

www.autochinanet.com/.../s11202644160648022300-china_best_hk...

Product Range: replica modern classic furniture ..., replica modern classic Ludwig Mies ..., replica modern classic furniture ..., replica modern classic ...

[True replicas of Bauhaus furniture... armchairs, sofas, chairs and ...](#)

wists.com/kimthew/fec0fb7c72d57deae6152b50f3441c66

True replicas of Bauhaus furniture... armchairs, sofas, chairs and tables designed by Mies Van Der Rohe, Le Corbusier, M. Breuer, E. Gray, Mart Stam, G. Mucchi ...

[Replica of Mies van der Rohe Barcelona ottoman twin - Stools ...](#)

nlini.mag12.dk/.../furniture/.../ludwig-mies-van-der-rohe-barcelona-...

Replica of Mies van der Rohe Barcelona ottoman twin Well padded benches are rare, ... furniture that van der Rohe's Barcelona bench will not do well with.

[modern vintage furniture](#)

www.modernvintagefurniture.com/seating-knoll.html

As a leading Modernist architect and furniture designer, Mies elevated ... Not a reproduction, this classic Knoll Studio design, produced to Mies' van der Rohe's ...

[Mies van der Rohe's Mies MR Table Replica Orville Side Table ...](#)

www.interiortradefurniture.com/orville-side-table-occasional.html

Orville White High Gloss Lacquered Wood Side Table, Orville Side Table-Occasional |Shop Modern Furniture Online Orville Side Table-Occasional. Mies van der ...

[Mies chairs in Living Room Furniture - Shop at Bizrate](#)

www.bizrate.com/living-room-furniture/mies-chairs/

Visit Bizrate to find the best deals on Living Room Furniture from Knoll. Chair by Alphaville Design Mies-inspired design replica, featuring premium ...

[Sevilla - 72" Daybed by Alphaville Design](#)

manhattanhomedesign.com/sevilla-72-daybed-db-sevi-72-mw-mi-k-...

Sevilla - 72" Daybed by Alpha Design Mies-inspired design replica, featuring an ... Quality reproduction of modern classic furniture by Mies van der Rohe ...

[Mies van der Rohe: iit.edu, knoll.com, italiadesigns.co.uk ...](#)

webdetail.org/tag/Mies_van_der_Rohe

Modern classic and bauhaus design furniture reproductions by le corbusier eileen gray mies van der rohe charles eames chair table lamp sofa armchair ...

[kardiel.com Review](#)

www.webutation.net/go/review/kardiel.com

Nov 3, 2011 – Quality Mid Century Classic Furniture Reproductions. Nationwide Home Delivery. Mies Van Der Rohe, Le Corbusier, Arne Jacobsen and more. ...

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 7 of about 4,840,000 results (0.14 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

[modern furniture reproductions](#)

www.the-best-modern-furniture.com/modernfurniturereproductions...

Modern Chairs · Children · ECO Baby · Eames Furniture · Mies van der rohe · Eero Saarinen Reproductions Wall decor. Link Resources Tell your story ...

[Kardiel - Wall | Facebook](#)

www.facebook.com/pages/Kardiel/176373379042117?sk=app...

Quality Mid Century Classic Furniture Reproductions. Nationwide Home Delivery. Mies Van Der Rohe, Le Corbusier, Arne Jacobsen and more. Trade prices for ...

[Modern Furniture Icons, Classic Modern Design, Marcel Breuer ...](#)

www.purecontemporary.com/Article/furniture-s-modern-icons

A consumer's guide to shopping modern furniture's classic designs. ... Even in Florence Knoll's early reproductions of the Barcelona Chair, modifications were made from the original. ... The Barcelona chair by Ludwig Mies van der Rohe. ...

[Mies van der Rohe, Ludwig - Knoll : Designer](#)

www.knoll.com › Home › Designers › Designers Category

Ludwig Mies van der Rohe began his career working in his father's stonemasonry business. After an apprenticeship with furniture designer Bruno Paul in Berlin, ...

[Design furniture reproductions of Eames, Marcel Breuer, Barcelona ...](#)

www.dominidesign.com/gb/ - Netherlands - Translate this page

Reproductions of design furniture from famous furniture designers like Charles and Ray Eames, Ludwig Mies van der Rohe, Shin & Tomoko Azumi, Arne ...

[China Best \(HK\) company limited - replica modern classic furniture ...](#)

www.chinametalsnet.com/.../china_best_hk_company_limited_...

China replica modern classic furniture Florence Knoll Sofa florence knoll settee,replica modern classic Ludwig Mies van der Rohe Barcelona Couch/Daybed ...

[Designer chairs | Classic Designer Furniture](#)

www.metrofurniture.co.uk/designers.html

Modern Designer furniture - Reproduced, beautiful, Classic designer furniture and ... pieces we covet, some of which are available as reproductions from Metro Furniture. ... For the record: Regarded, alongside Mies van der Rohe, as one of the ...

[Barcelona Chair and ottoman by Mies van der Rohe - modern classic ...](#)

www.diytrade.com › Home › Products › Home Supplies › Furniture

Jul 25, 2011 – Barcelona Chair and ottoman by Mies van der Rohe ... Brand: modern classic furniture reproductions. Origin: Made In China ...

[Shopping » Antiques and Collectibles » Furniture » Reproduction ...](#)

www.abc-directory.com/category/111218

Records 1 - 20 of 42 – ... Furniture - Reproduction Antiques: Reproductions ...

Victorian Furniture Company (Popularity <http://www.victorianfurnitureco...>)

Antique Country Furniture Store (Popularity <http://www...>)

[Good store for replica./knock-off furniture \(Eames etc ...](#)

[www.shanghaiexpat.com/.../good-store-for-replica-knock-off-furnitu...](http://www.shanghaiexpat.com/.../good-store-for-replica-knock-off-furniture.html)

8 posts - 4 authors - Last post: Aug 15, 2010

I found loads of Western designer **furniture as replicas** on Chinese ... chairs. Mies van der Rohe Barcelona chairs, Eileen Gray coffee table etc. ...

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#) [Advertising Programs](#) [Business Solutions](#) [Privacy](#) [+Google](#) [About Google](#)

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 8 of about 4,840,000 results (0.32 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

[replica modern classic furniture Carlo Colombo Chat Sofa - Quality ...](#)

www.xphou.com/sell-101496759389069377500-replica_modern_c...

Model:J302Name:Ludwig Mies van der Rohe Barcelona Couch/DaybedProduct

Size:1980... China replica modern classic furniture arne jacobsen series 3300 2-seater

...

[#CHEAP Mies van der Rohe: Objects and Furniture Design \(Objects ...](#)

bestoffurnituredesignbook.blogspot.com/.../cheap-mies-van-der-rohe...

Nov 4, 2011 – #CHEAP Mies van der Rohe: Objects and Furniture Design (Objects and

... Easy-to-Make Antique Furniture Reproductions: 15 Small Projects ...

[Replica Mies van der Rohe 'Brno' Chair - Furniture - Shopping.com ...](#)

au.shopping.com/au.shopping.com › Home and Garden › Furniture

Replica Mies van der Rohe 'Brno' Chair. Category: Dining Room Furniture; Dining Room Furniture Type: Chairs & Stools; Condition: New; Material: Leather ...

[The History Of Barcelona Chairs](#)

www.articlesnatch.com/Article/The-History-Of...Chairs-/3181459

Article Source: <http://www.articlesnatch.com>. About the Author: Modeco Furniture reproductions of modern classic designs by Le Corbusier, Mies van der Rohe, ...

[Barcelona Chair | Brno | Mies van der Rohe | Classic Style](#)

www.classicstyle.org/rohe-chair-brno-barcelona.html

Ludwig Mies van der Rohe has created two famous examples for a modern classic chair: Brno and Barcelona. Available at Classic Style's furniture online store.

[Bauhaus Möbel - Le Corbusier, Charles Eames, Marcel Breuer ...](#)

www.copiaclassica.com/ - Translate this page

Bauhaus Möbel von Charles Eames, Le Corbusier, Eileen Gray, Mies Van Der Rohe usw.: Lampen, Stühle, Sessel, Tische... Bauhaus Shop mit unschlagbaren ...

[Indonesia Teak And Wicker Furniture](#)

www.teak-wicker.com/Home/Link-Furniture.htm

[This site may harm your computer.](#)

Etnochic proposes solutions for businesses and custom furniture design ...

reproductions including classic furniture designs like Le Corbusier, Mies van der ...

[steelform.com at Website Informer. Modern classic and bauhaus ...](#)

website.informer.com/steelform.com

Sep 4, 1997 – Modern classic and bauhaus design furniture reproductions by le corbusier, mies van der rohe, charles eames, chair, table, sofa, armchair ...

[Mies Van Der Rohe Chair - Price comparison - Decoration and ...](#)

www.shopbot.com.au › Decoration and Furniture

Modern furniture design at wholesale prices. \$499.00. See offer. Replica Mies van der Rohe 'Brno' Chair. The Brno chair was originally designed in 1930 for ...

[Alphaville Design - Exposition Mies Chair - Home Furniture](#)

www.dcgstores.com/mies-chair.html

We are committed on offering you the highest quality Mies Chair reproduction available in the market at the most affordable pricing. Our Exposition Mies chairs ...

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#) [Advertising Programs](#) [Business Solutions](#) [Privacy](#) [+Google](#) [About Google](#)

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 9 of about 4,840,000 results (0.18 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

[modspaces.com](#)

www.keywordspy.com/overview/domain.aspx?q=modspaces.com

All the most popular modern **furniture reproductions** at incredible prices. ... Eileen Gray, George Nelson, Harry Bertoia, Le Corbusier, Mies van der Ro. ...

[Mies 'Barcelona' Day Bed - Shop online for modern **furniture** for](#)

www.lifeinteriors.com.au/_.../Replica_Mies'_Barcelona'_Day_Bed

The Barcelona day bed is not just a piece of **furniture** but a work of art. This Italian leather day ... Our **Mies** Day Bed is a high quality **reproduction** lounge chair. ...

[Benches | Bauhaus 2 Your House | Free Shipping](#)

www.bauhaus2yourhouse.com/collections/by-type-benches

Our contemporary **furniture** collection includes fully licensed **reproductions** from George Nelson, Mies van der Rohe, Sintesi Pankotto and many others. ...

[eames lounge chair reproduction - TooToo.com](#)

www.tootoo.com/buy-eames_lounge_chair_reproduction/

Eames Lounge Chair, Eames Chair, Eames Chairs, **Reproduction Furniture** ... Mies Van Der Rohe Barcelona Lounge Chair With Leather And Best Stainless ...

[Barcelona Chair Reproduction](#)

barcelonachairreproduction.net/

However, with the advent of stainless steel in 1950, Mies van der Rohe ... the Barcelona chair is still a "must have" piece of **furniture** in the homes of the rich and ...

[Replica Barcelona Double Lounge - Black leather - Mies van de Rohe](#)

www.relaxhouse.com.au/_.../barcelona-chair-double-lounge-chair-bla...

Replica Barcelona Loveseat Double Lounge - Black leather - Mies van de Rohe. ... Mies van Der Rohe was a German American architect and **furniture** designer. ...

[Mies van der Rohe - Mid-Century Modern Furniture by Rex Kelly ...](#)

www.rexkelly.com/index.php?p=catalog&mode=manufacturer...

Retro **Furniture** for Modern Living Specializing in Original & **Reproduction** Mid-Century Modern Design ... Replica Mies van der Rohe Barcelona Leather Daybed ...

[Mies Club Chair - Mid century **furniture**, mid century modern ...](#)

onestopmodern.com/mies-club-chair-p-2787.html

One Stop Modern - an eclectic mix of modern **furniture**, your one stop shop for ... **Reproduction** of the classic Mies design, handcrafted with fine leather and ...

[Home and Office **Furniture**, Interior Designers, Thailand, Thai Home ...](#)

www.thaiwebsites.com/furniture.asp

Home and office **furniture**, home decoration, interior design firms, Thailand. ... range of high quality **furniture reproduction** designed by famous designers such as Eileen Gray, Isamu Noguchi, Mies van der Rohe, Charles Eames, Verner Panton, ...

[Links and Resources for Artists and Arts Organizations](#)

www.northernfront.net/gnf/links/galleries.htm

Cheap office **furniture** www.sexylfurnishings.com/ Get Modern Cool Funky ...

reproductions including classic **furniture** designs like Le Corbusier, Mies van der ...

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#) [Advertising Programs](#) [Business Solutions](#) [Privacy](#) [+Google](#) [About Google](#)

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 10 of about 4,840,000 results (0.20 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

[Reproductions - the Furniture Portal.com](#)

www.thefurnitureportal.com/subpage.asp?...Reproductions...

Solid hand-carved mahogany Victorian **furniture reproductions** including lamps and ...
Bauhaus and modern classics **furniture** by Le Corbusier, mies v.d. Rohe, ...

[mies van der rohe furniture](#)

www.updowner.com/250/mies-van-der-rohe-furniture.htm

Aug 17, 2011 – Modern classic and bauhaus design **furniture reproductions** by le corbusier, **mies van der rohe**, charles eames, chair, table, sofa, armchair ...

[Barcelona Chair authentic Barcelona **furniture** mies van der rohe ...](#)

www.free-press-release.com/news/200803/1204417327.html

Mar 1, 2008 – That's where modern classic **furniture reproductions** come in. in the following topics: authentic Barcelona **furniture** mies van der rohe, knoll ...

[Replica Barcelona Bench 134cm Length - Nathan Rhodes Design](#)

www.nathanrhodesdesign.com/.../replica-barcelona-bench-134cm-le...

First introduced in 1929, Mies van der Rohe's Barcelona Bench is a true classic of **furniture** design. This luxurious **replica** is true to the original design that has ...

[classic furniture |Period furniture - reproduction | Companies](#)

www.europages.co.uk/business-directory.../classic-furniture.html

We are specialised in selling modern classic **furniture** and swivel designs The best of bauhaus **reproductions** such as eames,bertoia,armie jacobsen,**mies van** ...

[barcelona daybed, china barcelona daybed, barcelona daybed ...](#)

www.tradevv.com/Offers

Sell Barcelona **Furniture**, Barcelona Daybed, **Reproduction Furniture**, Eames. The Mies van Der Rohe "Barcelona" Bench is a stylish smaller version of the day ...

[The Barcelona Chairs, Modern Furniture by Modern Architect Ludwig...](#)

www.scribd.com/.../The-Barcelona-Chairs-Modern-Furniture-by-Mo...

Sep 18, 2009 – In collaboration with his longtime companion Lilly Reich, **Mies van der Rohe** created several **furniture** designs that incorporated the ...

[Barcelona Chair - objectbook™](#)

objectbook.com/barcelonachair-o.html

The Barcelona chair and ottoman was designed by **Mies van der Rohe** for the ... It is one of the most stylish and elegant pieces of modern **furniture** of the 20th ... **Reproductions** are made by many manufacturers all around the world, under ...

[modernclassics.com - Twitter Icons](#)

www.freetwittericons.com/www/modernclassics.com

modern classics, modern classic, modern classic **furniture**, **mies van der rohe** daybed, ... Mid Century Modern **Furniture Reproductions** - Direct Importer Modern ...

[Video About Replica Mies van der Rohe Barcelona Leather Chair ...](#)

www.encyclopedia.com/.../lRzzmqN7Ba4-replica-mies-van-der-rohe...

Replica **Mies van der Rohe** Barcelona Leather Chair - Standard From Matt Blatt ... Matt Blatt delivers interesting **furniture**, lighting and accessories in a ...

[Previous](#)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#) [Advertising Programs](#) [Business Solutions](#) [Privacy](#) [+Google](#) [About Google](#)

+You Web Images Videos Maps News Gmail More

Sign in



mies furniture replicas

Search

Page 11 of about 4,840,000 results (0.17 seconds)

Everything

Images

Maps

Videos

News

Shopping

More

Hastings-on-Hudson, NY

Change location

All results

Sites with images

Related searches

More search tools

[Barcelona Chair - The Barcelona Chair created by Ludwig Mies van ...](#)

www.barcelona.com › Barcelona

Barcelona Chair of Ludwig Mies van der Rohe ... licensed the rights of reproduction to Knoll, the current licensed manufacturer and holder of all trademark rights. ... der Rohe never again produced any furniture designs after their partnership ...

[Designer Furniture Shops - Designers](#)

www.nalee.com/home/furniture/designer.htm

Designer Furniture Shopping list of businesses is a collection of resources to ... **furnitures** designers, Eames chairs, Isamu Noguchi coffee tables, Mies Van Der ... Supplies a range of **replica** designer **furniture**, reproduction **furniture** styles, ...

[Modern Furniture Design in the Era of Modernism - History and ...](#)

www.furnituremodern.com/Modernism.aspx

FurnitureModern.com describes the **furniture** modernism era, by the ... with his Chaise Lounge, Ludwig Mies van der Rohe and the Barcelona Chair, Marcel Breuer, ... Later in Berlin, he began to design tubular metal **furniture** pieces, **replicas** of ...

[Replica Mies van der Rohe Barcelona Leather Daybed - Premium ...](#)

www.youtube.com/watch?v=c9Em5eG2h-8

Jun 7, 2011 – See it here: <http://www.mattblatt.com.au/Day-Bed/Replica-Mies-van-der-Rohe-Barcelona-Leath...> Matt Blatt delivers excellent **furniture**, lighting ...

[Arco Lamp- Barcelona CHAIR Mies van der rohe EAMES Lounge ...](#)

pennsylvania.pittsburghcitypaper.ws/FurnitureForSale/.../mies.../6368...

Jul 18, 2011 – Arco Lamp- Barcelona CHAIR Mies van der rohe EAMES Lounge chair ... le corbusier sofa day bed replica lc5 le corbusier sofa day bed repro lc5 le ... villa roche charlotte perriand lc4 wassily chair design **furniture** chair free ...

[Quality Mies Van Der Rohe Designer Modern Classic Furniture ...](#)

www.chinaqualityshoes.com/d-p1122712970012975625-mies_van_...

Mies Van Der Rohe Designer Modern Classic Furniture Barcelona Chair for sale ... Our modern collection includes well known designer **reproductions** and solid ...

[Antique furniture - online resources including dealers, reproduction ...](#)

www.linkbonny.com/antique-furniture.htm

Antique **furniture** online - dealers, **reproduction** antique **furniture** outlets, ... 20th Century **furniture** designed by Le Corbusier, Isamu Noguchi, Mies van der Rohe, ...

[Italian Furniture,Italian Style,Modern,Contemporary Furniture from ...](#)

www.scrapbookscrapbook.com/DAC-ART/italian-furniture.html

Italian **Furniture**,Contemporary **Furniture**,European Style Design. ... and leather sofa sets, beautiful **reproductions** of modern classics design by Le Corbusier, Barcelona sofa and chair by Mies Van der Rohe, Bibendum by Eileen Gray, Eames, ...

[Mies Van Der Rohe Replica Barcelona Chair/Sofa - Black Auction ...](#)

www.graysonline.com/.../furniture/mies-van-der-rohe-replica... - Australia

Mies Van Der Rohe Replica Barcelona Chair/Sofa - Black. Lot Number: 0003-170684 Office FurnitureOffice Furniture · Office Furniture and Equipment ...

[Replica Mies Van der Rohe Barcelona Leather Chair - Deluxe From ...](#)

leatherarmchair.buy2days.com/replica-mies-van-der-rohe-barcelona-...

[**Replica Mies Van der Rohe Barcelona Leather Chair - Deluxe From Matt Blatt Video ...**](#)

[Funky Furniture, cool furniture, replica furniture, design furniture, ...](#)

[Previous](#)

[1](#) [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) [10](#) [11](#) [12](#) [13](#) [14](#) [15](#) [16](#) [17](#) [18](#) [19](#) [20](#)

[Next](#)

[Advanced search](#) [Search Help](#) [Give us feedback](#)

[Google Home](#)

[Advertising Programs](#)

[Business Solutions](#)

[Privacy](#)

[+Google](#)

[About Google](#)

EXHIBIT B



1-866-776-2680

now in your cart 0 items

[Home](#)[What's New](#)[Clearance Sale](#)[About](#)[Contact Us](#)

Ibiza Chair - Pure Leather, Stainless Steel

[Bar Stools](#)[Chairs / Loungers](#)

- [» Lounge Chairs](#)
- [» Office Chairs](#)

[Computer Workstations](#)[Dining Sets](#)[Lights and Lamps](#)[Models/Miniatures](#)[Ottomans / Benches](#)[Outdoor Wicker](#)[Sofas / Sectionals](#)[Tables](#)[TV Stands](#)

Click thumbnails to enlarge

[View All Products](#)**Shop by Price**

- [Under \\$200.00](#)
- [From \\$200.00 to \\$400.00](#)
- [From \\$400.00 to \\$600.00](#)
- [From \\$600.00 to \\$800.00](#)
- [From \\$800.00 to \\$1000.00](#)
- [\\$1000.00 and above](#)

- [» About Us](#)
- [» FAQs & TOS](#)
- [» Privacy Policy](#)
- [» Contact Us](#)
- [» Catalog Feed](#)

- [New Articles \(0\)](#)
- [All Articles \(139\)](#)
- [» Buyer Guides \(3\)](#)
- [» Contemporary Ideas \(129\)](#)
- [» Educational \(7\)](#)

Available Options:Color: Ottoman:

DISCLAIMER

OUR IBIZA CHAIR IS A REPLICA OF A CHAIR DESIGNED IN 1929 BY MIES VAN DER ROHE, OFTEN REFERRED TO AS THE BARCELONA CHAIR. KNOLL, INC. PRODUCES AND SELLS THE AUTHENTIC BARCELONA CHAIR, WITH THE ENGRAVED SIGNATURE OF MIES VAN DER ROHE AND A CERTIFICATE OF AUTHENTICITY, AT PRICES IN THE THOUSANDS OF DOLLARS, MANY TIMES HIGHER THAN THE PRICE OF OUR IBIZA CHAIR. OUR REPLICA OF THE BARCELONA CHAIR IS INTENDED FOR CONSUMERS WHO WISH TO PURCHASE A REPRODUCTION OF A CHAIR OF HISTORIC DESIGN AT AN AFFORDABLE PRICE. REGENCYSHOP HAS NO AFFILIATION WITH KNOLL AND DOES NOT SELL, DISTRIBUTE OR OFFER FOR SALE ANY PRODUCT MADE OR OFFERED FOR SALE BY KNOLL. WHILE THE IBIZA CHAIR HAS A SIMILAR DESIGN TO THE BARCELONA CHAIR SOLD BY KNOLL, REGENCYSHOP CANNOT GUARANTEE THAT THE IBIZA REPLICA CONFORMS TO THE EXACT SPECIFICATIONS OF THE CHAIR DESIGNED BY MIES VAN DER ROHE AND SOLD BY KNOLL. VISITORS TO THIS SITE WHO WISH TO CONSIDER BUYING THE BARCELONA CHAIR FROM KNOLL, SHOULD VISIT KNOLL'S WEBSITE AT KNOLL.COM

Meticulously handcrafted with fine leather & leather match for the back and sides. Constructed using individual leather panels, each piece cut and hand-sewn. The frame is made from ONE-PIECE solid stainless steel, not cheap metal or aluminum like other inferior replicas.

FEATURES

- Genuine TOP-GRADE Leather seating area
- One-Piece Stainless Steel frame
- Meets architectural specifications of the original design.

Dimensions:

| | |
|-----------------------|-----------------------|
| Chair | Ottoman |
| Height: 30" | - |
| Width: 32" | Width: 24" |
| Depth: 31" | Depth: 26" |
| Seat Height: 18.5" | Seat Height: 18.5" |

Color Options:

White

Black

NO STOCK IMAGES

Do not be fooled. Most retailers use stock images, then send you an inferior quality item that looks nothing like the pictures.

At RegencyShop, our items look EXACTLY like the pictures showcased on our web site.

NO SURPRISES